

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re )  
**PETER SZANTO** ) Case No. 16-33185-pcm7  
)  
)  
) APPLICATION FOR  
)  INTERIM  FINAL (***Mark ONE***)  
) PROFESSIONAL COMPENSATION  
Debtor(s) )

The applicant, Jordan Ramis PC, has performed professional services as a(n) attorney for trustee for the period from 2/26/19 to 12/31/20. Pursuant to 11 USC §§330 or 331, and LBR 2016-1, the applicant, by and through the undersigned, applies for compensation as marked above, and certifies the following is true and correct:

1. The applicant has received the following pre-filing compensation (indicate date, amount, payor, payor's relation to case, and description of all monies and any other consideration received):  
none

2. Applicant requests allowance of compensation for: Professional Services of \$ 192,764.00; Expenses of \$ 94.35; for a Total of \$ 192,858.35.

3. [If applicable] Applicant was appointed by court order entered on 3/11/19, per an Application for Employment filed on 3/11/19. The employment order did not specify a rate of compensation except as follows:  
**Hourly \$370. Applicant was appointed by the above order to represent to former trustee, Stephen Arnot. Applicant was employed by the successor trustee, Candace Amborn, by order entered on 3/27/19, per an Application filed on 3/27/19.**

4. Applicant's prior requests for compensation in this case are as follows:

<u>Date of Application</u>	<u>Amount Requested</u>	<u>Amount Allowed</u>	<u>Amount Received</u>	<u>Payment Source</u>
	Fees	Expenses	Fees	Expenses
	<u>N/A</u>			

TOTALS: \$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

5. The applicant has not shared or agreed to share any compensation received or to be received for services rendered in connection with this case, except with a regular member, partner, or associate of Applicant's firm.

6. The rate of compensation, number of hours and requested fee for each person included in this application are summarized as follows:

Timekeeper (name & initials)	Title	Hourly Rate	Number Of Hours	Requested Fee
Gary L. Blacklidge (GLB)	attorney	\$370	266.6	\$98,242
Russell D. Garrett (RDG)	attorney	\$370*	117.1	\$43,327
Robyn L. Stein (RLS)	attorney	\$300	14	\$4,200
Robyn L. Stein (RLS)	attorney	\$325	144.9	\$46,995

\*Mr. Garrett is charging a discounted rate for his time as his normal hourly rate is \$495.

7. [Schedules A, B & C apply only if compensation is sought under 11 USC §§330 or 331] Attached and incorporated herein by reference are the following schedules (check those that apply):

- Schedule A - A narrative summary of services provided including total hours and resulting benefits to the estate of each activity category. [Preferred, but only mandatory if application exceeds \$3,000.]
- Schedule B - [If this is the First Application for Compensation] A brief narrative and itemization detailing all case-related PRE-PETITION fees. [Itemization mandatory; narrative mandatory if compensation requested exceeds \$3,000.]
- Schedule C - An itemized billing setting forth a description of each event, including the date, amount of time spent, and name of the person performing each event. [Mandatory]

8. Applicant requests the following expense reimbursement: a. A total of \$ \$94.35 for expenses that fall within the limits set forth in LBR 2016-1 (no itemization required); AND b. Other (describe each in detail):

9. ADDITIONAL REQUIREMENTS for INTERIM compensation application: (a) a current Interim Report, on LBF #753 for Chapter 7 cases or LBF #1153 for Chapter 11 cases, must be filed with the court before this Application is filed; AND (b) a completed and served Notice of Intent to Compensate Professional(s) using LBF #753.40 must be filed, and linked to each pertinent Application if filed electronically, before the Application will be considered by the court.

DATED: 2/19/21

/s/ Gary L. Blacklidge

Signature

Gary L. Blacklidge, Attorneys for Trustee (503) 598-5591

Signer's Name, Relation to Applicant, and Phone #

Two Centerpointe Dr., 6th Floor

Address

Lake Oswego, OR 97035

*In re Szanto*  
U.S. Bankruptcy Court Case No. 16-33185-pcm7

Schedule A – Application for Chapter 7  
Interim compensation of Attorney for Trustee

**I. Background**

Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code on August 16, 2016. The case was converted to Chapter 7 on December 5, 2017, due to the debtor's failure to comply with numerous requirements of a debtor in possession and failure to disclose certain financial interests in other accounts and entities. Stephen P. Arnot was appointed Trustee on that date.

Mr. Arnot subsequently employed the firm of Williams Kastner Greene & Markley has his attorneys and Gary L. Blacklidge, an attorney at that firm assisted Mr. Arnot on this case as attorney for the Trustee until Mr. Blacklidge left that firm on January 31, 2019. Due to Mr. Blacklidge's familiarity with the ongoing matters and history of this case, Mr. Arnot employed Mr. Blacklidge's new firm, Jordan Ramis PC, as attorneys for the Trustee and an order was entered herein in March, 2019.

Soon thereafter, Mr. Arnot took a position with the United States Trustee and resigned as Trustee of this case. Candace Amborn was appointed as his successor. Ms. Amborn employed the firm of Jordan Ramis PC and Mr. Blacklidge, as attorneys for the Trustee, again, due to Mr. Blacklidge's familiarity with the ongoing matters, the debtor, and history of this case. This application for compensation includes both the short period of time Jordan Ramis PC represented Mr. Arnot, as Trustee, and the period through the end of 2020 that Jordan Ramis PC has represented Ms. Amborn, as Trustee. This is the first request for compensation by Jordan Ramis PC.

The services rendered to the Trustee in this case, as the court may no doubt suspect, have been more costly to the estate given the debtor's conduct, including his failure to comply with the duties of a debtor, his opposing the Trustee in her attempt to recover transferred assets, his misrepresentations, his fabrication of documents and multitude of appeals. A narrative summary follows below of the specific matters covered and detailed in the attached Schedule C during the time period of this interim application. The services rendered may be susceptible to being placed in more than one category or in a completely separate category.

Some of the time entries during the transition from the former trustee to the successor trustee reveal the counsel for the trustee was involved in assisting the successor trustee in matters the former trustee might have handled. The former trustee was not only the Chapter 7 trustee in this case, but also an integral part of the team of attorneys for the trustee and employed as such in this case. When the former trustee left the firm and resigned his role as Chapter 7 trustee, that institutional memory resided only in the remaining attorney employed by the former trustee. Despite the appearances or certain time entries, which have not been altered, counsel for the Trustee believes that it acted in the best interest of the estate and within its role as counsel for the

Trustee. Except for the litigious nature and conduct of the debtor, none of this time would have been necessary.

In assisting and advising the Trustee, it was necessary for the Trustee's counsel to take a more active role in matters, such as liaison between the Trustee and Singapore counsel, with whom the Trustee's attorneys had been communicating, in advising them on issues of the debtor and this US Bankruptcy case and US Bankruptcy laws, the history of this case, and in reviewing their Singapore pleadings for factual accuracy.

## II. General Administrative Matters, Matter No. 77749

Jordan Ramis PC ("JR") assisted both Trustees with general administrative matters of this estate, which included transition issues relating to the substitution of the Trustee, substituting parties and filing notices of appearance in various adversary proceedings and appeals, reviewing emails, motions and objections filed by the debtor, reviewing court orders denying the debtor's many motions to the court on various matters, and providing documents and information to the US Trustee for the denial of discharge adversary proceeding and trial. The services also included assisting the former trustee with the interim application for compensation for Williams Kastner filed before the substitution of Trustee in this case. JR also worked to provide Ms. Amborn's office with information regarding the engagement and employment of Singapore counsel, Rajah & Tann. JR's services included responding to counsel for debtor's siblings, reporting fabricated email to the US Trustee, reviewing debtor's motions to US District Court for withdrawal of reference, and reviewing debtor's objections to claims. JR responded to and assisted the US Trustee in providing information and preparing for trial of denial of discharge. The services also included monitoring adversary proceedings that may result in claims against the estate, debtor's objection to Trustee's interim report to the court, reviewing and analyzing debtor's demand to return assets and court orders regarding the same. JR further analyzed and reported to the Trustee the debtor's misrepresentations and inconsistent allegations filed contemporaneously in US District Court and the Singapore Court. Based on the debtor's conduct in this case, it was necessary for JR to prepare and file a motion for further contempt against the debtor. The process was prolonged and exacerbated by the debtor's motions for extension and for court-appointed counsel, to stay all proceedings, and to recuse Judge Simon. The services provided to the Trustee for the motion for further contempt also included working on the opposition to debtor's motions, reviewing and analyzing the debtor's response and the alleged "facts" therein and consulting with the former Trustee regarding the debtor's failure to execute and deliver the authorization documents. JR appeared and filed a response in the US District Case regarding appointment of counsel and debtor's indigency and analyzed the District Court's stay of the motion for further contempt. JR also briefed the civil contempt issue at the request of the District Court. It was necessary for JR to contact Singapore counsel regarding the debtor's blatant misrepresentations to Judge Simon of Singapore law. The services provided by JR necessarily included preparation for the evidentiary hearing on the motion for further contempt, revising and providing to debtor authorization documents for signature to avoid being held in contempt. JR also had several lengthy phone conferences with debtor in which debtor was encouraged to sign and return the revised authorization documents to avoid being held in contempt. Such conferences also included debtor's request that the Trustee withdraw the

contempt motion and news of Susan Szanto's death. The time in this matter also includes time reviewing and analyzing bank statements received from counsel for HSBC Bank Singapore.

### III. Registration of Bankruptcy Court Orders in Singapore, Matter No. 77435

Due to the former Trustee's resignation, and the fact that Singapore counsel had been working on lodging the Bankruptcy Court orders in Singapore for approximately a year before the substitution of the Trustee, it was necessary for JR to take an active role in assisting Singapore counsel and acting as liaison with the Trustee. The time spent by JR in this matter included assisting Singapore counsel with substituting Ms. Amborn in the Singapore proceeding, answering questions and providing Singapore counsel with pleadings, orders and information from the US Bankruptcy case, explanation of the status of debtor's appeal of the conversion order, reviewing and approving Singapore pleadings for factual accuracy, and reviewing affidavits for Trustee's execution and conferring with Trustee regarding the same. These services also included clarifying confusion for Singapore counsel relating to the US Bankruptcy procedure and notices they received from US Bankruptcy Court and status of appeals. JR further provided information to Singapore counsel about the debtor and the debtor's conduct in this case and in other cases and adversary proceedings. JR also assisted Singapore counsel with investigating an email purportedly from HSBC Bank that was fabricated by the debtor requesting release of funds. The debtor's conduct also necessitated that JR explain to Singapore counsel that the debtor's amended petition had no effect to withdraw from the bankruptcy. Due to the debtor's opposition in Singapore, the court in Singapore required an independent expert on US Bankruptcy law to answer specific questions the court there had about US Bankruptcy law. JR assisted the Trustee with obtaining an expert to answer the Singapore court's questions and with the filing of the expert's affidavit. It was further necessary for JR to review and assist the Trustee's Singapore counsel in understanding the debtor's allegations of fraud by the US Trustee that the debtor raised in Singapore relating to the adversary proceeding brought by the US Trustee for denial of discharge, and the refusal of the US Trustee's counsel to testify in that trial, and the debtor's allegations of altered documents in that adversary proceeding. JR assisted the Trustee and Singapore counsel with reviewing, analyzing and investigating the fraudulent affidavit of debtor's purported expert in Texas, fabricated by the debtor, and with reviewing and revising the Trustee's affidavit regarding that fraudulent affidavit. JR further reviewed and edited correspondence to the court many of which were necessitated only because of the debtor's wild unsupported allegations and motions for extension or to postpone hearing. JR further reviewed and analyzed debtor's filing a writ of summons in Singapore against Mr. Arnot, Ms. Amborn and Mr. Hogue. JR reviewed and consulted with Singapore counsel regarding the further submissions requested by the court and the distinctions between an involuntary bankruptcy and a voluntary filing. Due to the debtor's intervention in the Singapore proceeding, opposing the Trustee's counsel at every step, raising false allegations, misrepresenting the status of this bankruptcy case and of the appeal of the conversion order, making inconsistent arguments, and much more, it was necessary for JR to work closely with Singapore counsel in order to prevail in what should have been a quite simple proceeding. JR's services assisted the Trustee in obtaining an order in Singapore recognizing the US Bankruptcy Court Orders, but requiring a further order of the court for any repatriation of funds. Even though the debtor attempted to appeal the order, he was unable to do so for failure to post the required sum for costs.

#### IV. Appeal of Conversion Order, Matter No. 77755

Approximately a year after the conversion order was entered in this case, the debtor filed a Rule 60(b) motion seeking to set aside the conversion order. The motion was denied by this court and the debtor appealed to the US District Court. JR reviewed and analyzed the debtor's briefs and arguments and the response brief filed by IRS counsel. JR drafted a response brief and joinder with the IRS response brief and reviewed the debtor's many extension requests for filing his reply brief. JR further reviewed and analyzed the debtor's appeal of Judge Simon's ruling to the 9th Circuit and assessed debtor's failure to comply with the prefiling review order. JR has monitored the appeal and debtor's efforts to lift the prefiling review order and his many motions to extend the time for complying with the prefiling review order which requires filing his required statement for good cause.

#### V. Appeal of Susan Szanto Claim, Matter No. 78049

Due to the number of appeals debtor filed with US District Court, Judge Simon stayed certain appeals while others proceeded. The appeal of this Court's denial of Susan Szanto's proof of claim was one of the appeals stayed until January 2020. The court requested a briefing schedule from the parties and JR complied. The debtor represented that he was the "secretary" for Susan Szanto and filed many motions for extension until the opening brief was finally filed in September 2020. JR researched, drafted and timely filed the response brief on behalf of the Trustee. JR has continued to monitor the appeal as the debtor continued to file motions for extension on behalf of Susan Szanto.

#### VI. Appeal of Yankee Trust Corporation Judgment, Matter No. 78050

This appeal is also one that Judge Simon stayed until January 2020. Again, JR drafted and submitted a proposed briefing schedule at the request of the court. And again, JR monitored the many motions for extensions filed by the debtor and investigated the debtor's many misrepresentations to the court that he had called and attempted conferral with Trustee's counsel. Debtor's opening brief was finally received in October 2020. JR researched and drafted the Trustee's response brief, which was timely filed. JR reviewed and analyzed debtor's reply brief which was finally filed in December after extension. JR is awaiting Judge Simon's ruling.

#### VII. Appeal of Williams Kastner Compensation Order, Matter No. 78051

As stated above, both Mr. Arnot and Mr. Blacklidge left the firm of Williams Kastner Greene & Markley in early 2019 while an interim application for compensation was pending in this Court. Both Mr. Arnot and Mr. Blacklidge had done substantial work for the Trustee prior to leaving and were the only persons familiar with this case and this debtor and had attended the hearing in this court on the objection to compensation. JR assisted the Trustee in coordinating with Mr. Arnot and providing information to Williams Kastner in filing a motion to dismiss the appeal and in replying to debtor's response.

VIII. Amborn v HSBC Bank – Adv, Proc. 18-03029, Matter No. 78100

This adversary proceeding has been abated by agreement of the parties and the court pending the outcome of the Trustee's efforts in Singapore to get the Bankruptcy Court orders recognized there. JR has attended periodic status conferences and kept the court and opposing counsel apprised of the Trustee's progress there, which has been continuously hindered by the debtor's opposition in Singapore. JR has provided opposing counsel continually with the status of the court's ruling, the interim stay imposed, and the debtor's efforts to appeal the Singapore ruling. HSBC Bank continues to cooperate with Singapore counsel and the Trustee and JR anticipates that this adversary proceeding may soon be dismissed.

IX. Appeal of Order 998, Matter No. 78583

This matter involves the debtor's appeal to the BAP arising from the debtor's demand for the return of all assets. JR has appeared and monitored this appeal including debtor's motion for proceeding *in forma pauperis* and the referral to the District Court for that determination. JR has further monitored the debtor's many motions for extension to filing his opening brief.

X. Appeal of Order 982, Matter No. 78756

This matter involves the debtor's appeal to the BAP arising from this court's orders following the Trustee's providing a status report at this court's request for informational purposes only upon which this court stated it would take no action. As usual in these appeals, the debtor moved for and was granted an extension to file his opening brief. JR has appeared and monitored this appeal and attempted to analyze debtor's motives.

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-77749 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** General Administrative Matters

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
02/26/19	Telephone conference with Steve Arnot re Szanto case and representing trustee in the appeals of the adversary proceedings, personal property, etc. [0.5].	GLB	0.50	\$185.00
02/27/19	E-mails from and to district court Mary Austad re status conference [0.2]; e-mails to and from Steve Arnot re same and employment [0.2].	GLB	0.40	\$148.00
02/28/19	Receive and review e-mail to Nick Henderson outlining remaining administrative tasks [0.1]; e-mail to Steve Arnot re employment and creating files for appeals [0.1]; review district court case dockets [0.3].	GLB	0.50	\$185.00
03/01/19	Review debtor's motion for extension of time to file opening briefs in district court consolidated case [0.5]; review debtor's opening brief in consolidated district court case [2.3]; review district court case pacer docket for status [0.2].	GLB	3.00	\$1,110.00
03/04/19	Receipt and review of application to employ attorney, finalize certification and e-mail to Steve Arnot [0.1].	GLB	0.10	\$37.00
03/08/19	Email from Steve Arnot re status of order of employment [0.1]; e-mail to Steve re deadlines for appeals and status of Singapore matter [0.1].	GLB	0.20	\$74.00
03/11/19	Receipt and review of order authorizing employment [0.1].	GLB	0.10	\$37.00
03/12/19	Emails from and to Steve Arnot re telephone conference re Yankee Trust and Susan Szanto [0.1].	GLB	0.10	\$37.00
03/14/19	Receive and review of debtor's objection to interim fee application [0.6]; e-mails to and from Trustee re debtor's objection to fee app and timing on response [0.1].	GLB	0.70	\$259.00
03/15/19	Receive appointment of Candace Amborn as successor trustee [0.1].	GLB	0.10	\$37.00
03/18/19	Emails from and telephone call to Steve Arnot re appellate issues and transfer to new trustees [0.3]; attend telephonic status conference before Judge Simon re briefing schedule [0.5]; conference with Russ Garrett re bankruptcy appeals [0.3].	GLB	1.10	\$407.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
03/19/19 Receipt and review of notice of hearing on debtor's objection to trustee's interim report [0.1]; e-mail from Steve Arnot re timing on resignation and employment application for Candace Amborn [0.1]; e-mails to Steve Arnot re employment with Candace and hearing on objection to interim report and fee app [0.1]; e-mail to Priscilla Gray re application to employ and disclosures [0.1].	GLB	0.40	\$148.00
03/20/19 Email from debtor re setting over hearing [0.1]; e-mail to trustee re debtor's request to set over hearing [0.1].	GLB	0.20	\$74.00
03/21/19 Receipt and review of debtor's motion for alternate hearing date [0.3]; analyze Jewish holidays approaching Passover [0.1]; e-mail to Trustee re same [0.1]; receipt notice of rescheduled hearing [0.1]; receive order granting debtor's motion [0.1].	GLB	0.70	\$259.00
03/26/19 Revise and finalize application to employ attorney for Candace Amborn [0.1]; e-mails to and from Candace re application and EIN [0.2].	GLB	0.30	\$111.00
03/27/19 Receipt of Order approving application to employ attorney for trustee [0.1]; receipt and review of former trustee's final report [0.2].	GLB	0.30	\$111.00
03/28/19 Emails from and to former trustee re hearing on debtor's objection to WKG&M fee app [0.3].	GLB	0.30	\$111.00
03/29/19 Emails from and to Steve Arnot re filing Notices of appearance in adversary proceedings and substituting Amborn, trustee, in as plaintiff in those cases [0.2]; receive and review resignation of Arnot as attorney for trustee [0.1].	GLB	0.30	\$111.00
04/01/19 Receive and review motions filed by debtor re Chase Claim No. 6 and disallowance and relief from stay [0.3]; e-mail to trustee re debtor's motions [0.1].	GLB	0.30	N/C
04/02/19 Review debtor's motion to continue stay relief hearing [0.4]; review court's order denying debtor's motions re relief from stay [0.2].	GLB	0.60	N/C
04/08/19 Review correspondence from debtor to court re decision on relief from stay [0.1].	GLB	0.10	N/C
04/09/19 Receive and review correspondence from court re: setover of hearing [0.1].	GLB	0.10	\$37.00
04/23/19 Email from Steve Arnot re Martin Smith taking over for Carla and request for documents re Yankee Trust Corp transfers and overseas transfers [0.1]; e-mail to Steve re same; review files for documents [0.7]; e-mail to Steve re confirming correct documents requested by Martin Smith [0.1]; review district court case docket for substitution of trustee [0.2].	GLB	1.10	\$407.00
04/24/19 Review files received from Steve Arnot [1.2]; conference re electronic files for recent pleadings [0.2]; review trustee's third report [0.1].	GLB	1.50	\$555.00
04/29/19 Review Debtor's objection to Application for interim compensation and Trustee's third interim report [0.6]; review fee app time and cost records for color copies and investigate why color copies were made [0.5].	GLB	1.10	\$407.00
05/01/19 Attempt call in to hearing [0.2]; attend telephonic hearing on debtor's objection to trustee's report and WKGM fee application [0.5]; call from Steve Arnot re hearing and debtor's disabilities [0.1]; receipt and review of District Court Order on Withdrawal of Reference [0.7].	GLB	1.50	\$555.00
05/02/19 Telephone call from Ward Greene at Williams Kastner re results of hearing on objection to fee application [0.2]; receive and review minutes of hearing [0.1].	GLB	0.30	\$111.00
05/06/19 Receive and review correspondence from debtor to court re demand for evidentiary hearing on fee app [0.2]; e-mail to Steve Arnot re materials requested by US Trustee's office [0.1].	GLB	0.30	\$111.00
05/07/19 Telephone call from Candace Amborn re Singapore fees and fee application, hearing on May 1 on Szanto's objection to WKGM fee application, Szanto appeals and Szanto's behavior [0.5].	GLB	0.50	\$185.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
05/07/19	Receive and review order on interim fee application [0.3].	GLB	0.30	\$111.00
05/22/19	Emails from and to Trustee re order granting Arnot's interim compensation and final compensation [0.2]; review district court case dockets on appeals for brief of debtor and court's errata entry [0.4]; review notice of appeal of conversion order [0.2]; analyze timing on substituting Candace Amborn in for Steve Arnot as trustee in district court appeals [0.2].	GLB	1.00	\$370.00
05/23/19	Conference with Robyn Stein re appeals to district court, merits of appeals and substitution of trustee as a party [0.6]. Strategize with Gary Blacklidge regarding multiple appeals and need for change to trustee information or substitution of parties, and begin analysis of procedure to change or substitute trustee.	GLB RLS	0.60 0.70	\$222.00 \$210.00
05/24/19	Review and assess appeal jurisdiction and party status regarding successor or Substitute trustee party and request further information Continue analysis of need for filing notice of bankruptcy trustee change in various matters, strategize with Russ Garrett regarding same.	RDG RLS	0.40 1.40	\$148.00 \$420.00
05/28/19	Review and analysis of substitute trustee and advice regarding action to take regarding appeal issues	RDG	0.80	\$296.00
05/31/19	E-mail from Candace re pending Szanto cases, review registers for same and e-mail Candace re same and pending District Court appeals [0.3].	GLB	0.30	\$111.00
06/14/19	Review District Court case registers and e-mails re appeals and filing notice of appearance as counsel for Candace Amborn [0.4]. Continue assessment of case history and status of all matters [2.5]; prepare notices of appearance and motion for extension of time, as well as declaration in support of same [3.3]; provide direction to staff regarding service of same [0.2].	GLB RLS	0.40 6.00	\$148.00 \$1,800.00
06/18/19	Email from Robyn re delegation of labor on appeals [0.1].	GLB	0.10	\$37.00
06/24/19	Receive and review of Debtor's Motion for Stay of Proceedings due to upcoming surgery [0.4]; receipt and review of objection filed by US Trustee to motion for stay [0.3].	GLB	0.70	\$259.00
07/10/19	Review new motion to stay all proceedings filed by Szanto, memorandum to file regarding same.	RLS	0.30	\$90.00
07/12/19	Review debtor's emergency motion for stay filed in District Court appeal but related to all bankruptcy proceedings; confirm that no one has heard from debtor and that debtor has not returned calls. Outline rough response to emergency motion.	RDG RDG	0.80 1.10	\$296.00 \$407.00
	Email re docketing debtor's motion in district court to stay all bankruptcy proceedings [0.1]; conference re filing response to motion to stay all bankruptcy proceedings [0.2].	GLB	0.30	\$111.00
07/15/19	Identify issues of concern for chapter 7 trustee with motion filed by debtor and initial outline of concerns for response/ objection to debtor's motion for emergency writ of prohibition. Emails to and from Russ re filing precautionary response to debtor's motion in district court to stay all bankruptcy proceedings [0.2]. Strategize with Russ Garrett and Gary Blacklidge regarding response to debtor's motion to stay all proceedings.	RDG GLB RLS	0.60 0.20 0.20	\$222.00 \$74.00 \$60.00
07/17/19	Receipt of amended order in district court denying stay of bankruptcy proceedings [0.1].	GLB	0.10	\$37.00
08/09/19	Receipt and review of debtor's objections (several) to claims filed on behalf of siblings [0.4].	GLB	0.40	\$148.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
08/13/19	Receive and review order striking debtor's objection to claims [0.1]; receive and review of order striking notices of removal to district court [0.1].	GLB	0.20	\$74.00
09/03/19	Emails from and to from Nick Henderson re phone conference [0.1].	GLB	0.10	\$37.00
09/12/19	Review correspondence from debtor regarding undisclosed motion and apparent irritation and review file regarding possible issues.	RDG	0.30	\$111.00
09/20/19	Receipt and review of scheduling order filed in error [0.1].	GLB	0.10	\$37.00
09/26/19	Emails from and to former trustee re status of HSBC bank records [0.2].	GLB	0.20	\$74.00
09/30/19	Receive voice mail message and e-mail message from Martin Smith at US Trustee's office re trial and status in Singapore [0.2]; telephone call to Martin Smith re status in Singapore, trial on denial of discharge, transfers to Singapore [0.5]; e-mail from Candace Amborn re Martin Smith and her schedule [0.1].	GLB	0.80	\$296.00
10/01/19	Receipt and review motion to reimpose stay on debtor's residence [0.2]; e-mails from and to Steve Arnot re bank statements [0.1]; e-mail from Martin Smith re bank statements [0.1]; review bank statements from Martin Smith [0.3]; e-mail to Martin re same and availability for trial [0.1].	GLB	0.80	\$296.00
10/02/19	Review e-mail from Steve Arnot re testimony at discharge trial and need for documents [0.1]; review files for documents required by Steve Arnot for testimony in discharge litigation [2.2]; e-mails to and from Steve Arnot re documents found and appraiser's inventory [0.2]; email from Lynn at Amborn's office re fee app for Singapore counsel, deposit and engagement letter [0.1]; find and review engagement letter and e-mail to Lynn re same [0.3]; e-mail to Steve Arnot re handwritten inventory [0.1]; e-mails to and from C Knutson former paralegal for trustee re appraiser's inventory of personal property [0.1]; e-mail from S Arnot re same [0.1]; e-mail to Arnot re scanned bank statements for testimony in trial [0.1].	GLB	3.20	\$1,184.00
10/03/19	Emails from and to Lynn at Amborn's office re interim fee app for Rajah & Tann Singapore counsel, amendment of application estimate, Singapore v. US dollars [0.2]; e-mail from Lynn re reasons for need to amend application [0.1]; telephone call from Candace Amborn re amending application to employ Singapore counsel, fee app for Singapore counsel and estate administrative matters [0.5]; e-mails from and to Lynn re wording for explanation of increase in estimate for Singapore counsel [0.1]; review trustee's e-mail to Danny Ong re estimates [0.1].	GLB	1.00	\$370.00
10/31/19	Email to Candace re status on appeal of compensation orders, appeal of conversion order and UST's 727 trial [0.1].	GLB	0.10	\$37.00
11/13/19	Email from Lynn at Amborn's office re status of appeal of California case against debtor's siblings [0.1]; review Status of Appeal [0.1]; e-mail to Lynn re same, relationship to adversary proceeding against siblings and whether it should be abandoned [0.2]; telephone call from Candace Amborn re abandonment of California appeal and status of other pending appeals [0.3].	GLB	0.70	\$259.00
11/25/19	Review 49 -page opinion in Szanto adversary proceeding with siblings re damages and claims and vexatious litigant status [0.8].	GLB	0.80	\$296.00
11/26/19	Receipt and review of Judge McKittirick's correspondence ruling on debtor's claims objections to siblings proofs of claim [0.3].	GLB	0.30	\$111.00
12/02/19	Receive and review of debtor's motion filed in District court re complaints about various bankruptcy court rulings [0.4]; e-mail to Candace Amborn re debtor's motion in District Court [0.1].	GLB	0.50	\$185.00
12/03/19	Telephone call from Candace Amborn re pending estate matters, status of appeals, Singapore matter and debtor's recent motion to District Court [0.5].	GLB	0.50	\$185.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
12/04/19	Receive and review of Debtor's declaration re IRS proof of claim [0.2].	GLB	0.20	\$74.00
12/05/19	Emails from and to Nick Henderson re opinion in Szanto adversary proceeding and status in Singapore matter [0.2]; receipt and review of Second Amended Application to Employ Rajah & Tann [0.1].	GLB	0.30	\$111.00
12/09/19	Email to Debtor in response to e-mail threatening sanctions for alleged lies in amended application to employ Singapore counsel and review Rule 9011 for response [0.7].	GLB	0.70	\$259.00
12/10/19	Receipt and review of Notice of Appeal of Adversary Proceeding 16-03114 [0.1].	GLB	0.10	\$37.00
12/11/19	Receipt and review of amended notice of appeal of adversary Proceeding 16-03114 [0.1]. Emails from and to Candace Amborn re reporting debtor's bankruptcy crimes to Martin Smith at US Trustee's office [0.2]; receive and review copies of Candace's e-mail to Martin Smith [0.1].	GLB	0.10	\$37.00
12/12/19	Review Szanto siblings' second motion for attorney fees in adversary proceeding 16-03114 [0.2]; e-mail from Jonas Anderson at US Trustee's Office re fabricated e-mail [0.1]; e-mail to Jonas re copies of fabricated e-mail and related documents and explanation [0.4]; review e-mails from Martin Smith and Candace Amborn [0.1]; e-mail to Martin re e-mail to Jonas [0.1].	GLB	0.90	\$333.00
12/17/19	Review Debtor's Second Motion for Withdrawal of Reference for Adv. Pro No. 16-03114, re monitoring proofs of claims of siblings [0.5].	GLB	0.50	\$185.00
12/18/19	Receipt and review of Judge Simon's order on debtor's second motion for withdrawal of reference re filing in wrong case and moving to correct case and e-mail to Trustee re same [0.2].	GLB	0.20	\$74.00
12/20/19	Telephone call from Martin Smith at UST re status in Singapore and appeals to District Court, trial on denial of discharge and acting as witness [0.7].	GLB	0.70	\$259.00
12/31/19	Receipt of Judge Simon's order in 18CV00939 clarifying which appeals are stayed [0.1].	GLB	0.10	\$37.00
01/03/20	Review Szanto motion to extension in hearing on Claims 8 through 13 and allegations against trustee and counsel [0.2]; receipt of order striking motion [0.1]; e-mail to Candace re hearing on claims 8-13 [0.2].	GLB	0.50	\$185.00
01/06/20	Receive and review debtor's motion to disqualify or vacate second order employing Singapore counsel [0.5]; receipt and review of debtor's amended petition and notice thereof seeking to withdraw from bankruptcy and analyze same [0.3]; receipt and review of 9th Circuit Order dismissing appeal of district court order denying withdrawal of reference [0.1]; e-mail to Candace re same [0.1]; receipt and review of Order denying debtor's second motion to disqualify Singapore Counsel [0.2].	GLB	1.20	\$444.00
01/07/20	Attend telephonic hearing on claims 8 through 13 and monitor same [0.5].	GLB	0.50	\$185.00
01/08/20	Receive and review notice of final hearing on objection to IRS claim [0.1]; telephone call from Candace re status of claims objections and appeals [0.5]; receive and review order re Claims 8 through 13 [0.1].	GLB	0.70	\$259.00
01/15/20	Email from Martin Smith re court striking amended witness list for denial of discharge trial and availability as rebuttal witness [0.1]; e-mail to Martin re availability as rebuttal witness and timing on getting to court [0.1]; e-mails from and to Martin re possible questioning of Szanto which may need to be rebutted and arguments I suspect that Szanto will make regarding the Singapore transfers [0.2]; receipt and review of scheduling order for hearing on objection to IRS proof of claim [0.1].	GLB	0.50	\$185.00
01/21/20	Email to Martin Smith re Szanto's recent filings in Singapore for preparation of denial of discharge trial [0.4].	GLB	0.40	\$148.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
01/24/20 Receipt and review of various orders issued by Judge Simon regarding pending appeals [0.2].	GLB	0.20	\$74.00	
01/27/20 Emails from and to Steve Arnot re 341(a) transcript [0.1]; e-mails from and to Martin Smith re IRS exhibit from conversion hearing [0.1].	GLB	0.20	\$74.00	
01/28/20 Emails from and to Martin Smith re trial [0.1].	GLB	0.10	\$37.00	
01/29/20 Email from Martin Smith re evidence of Szanto asserting community property [0.1]; e-mails to Martin re filings by Szanto of assertion of community property [0.3].	GLB	0.40	\$148.00	
02/03/20 Receipt and review of Szanto Creditors' memorandum re WUCP & IIED claims [0.4]; receipt and review of Judge Simon's Order denying motion for writ prohibiting trial and withdrawal from bankruptcy [0.3]; e-mail same to Martin Smith [0.1].	GLB	0.80	\$296.00	
02/07/20 Email to Martin Smith re information needed regarding email purportedly from HSBC Bank [0.1].	GLB	0.10	\$37.00	
02/14/20 Email to Candace re US District Court briefing schedule for Susan Szanto and Yankee Trust Corp appeals [0.1].	GLB	0.10	\$37.00	
02/16/20 Receipt and review of Debtor's Motion to Disqualify David Criswell as an expert [0.3].	GLB	0.30	\$111.00	
02/17/20 Receipt and review of Debtor's motion for restraint against Trustee etc. [0.3].	GLB	0.30	\$111.00	
02/18/20 Receipt of Order Denying debtor's motion to disqualify David Criswell [0.1]; receipt of order denying debtor's motion for restraint and sanctions against Trustee [0.1].	GLB	0.20	\$74.00	
02/20/20 Receipt of debtor's request to waive filing fees for adversary proceedings [0.1].	GLB	0.10	\$37.00	
03/05/20 Emails from and to Yam at Rajah & Tann re fees incurred in Singapore and need for payment and to increase estimate of fees due to opposition by debtor [0.2].	GLB	0.20	\$74.00	
03/10/20 Receipt and review of interim application to compensate Rajah & Tann and notice of intent to incur expenses [0.1]; e-mail from and telephone call to Nick Henderson re status of case, appeals, and Singapore matter [0.5].	GLB	0.60	\$222.00	
03/11/20 Review e-mail from Nick Henderson to trustee re collecting against Susan Szanto [0.1]; e-mails from and to Candace Amborn re Nick Henderson's proposal to collect in California against Susan Szanto and community property and reducing claims [0.2].	GLB	0.30	\$111.00	
03/25/20 Emails from and to Nick Henderson re copies of Singapore filings pertaining to fraudulent affidavit filed by Szanto [0.1].	GLB	0.10	\$37.00	
03/27/20 Telephone call from Candace Amborn re hearing on claims objections by Szanto, status of claims and Singapore matter and appeals [0.5].	GLB	0.50	\$185.00	
03/31/20 Receive and review of Judgment denying Szanto discharge [0.1]; review opinion for denial of Szanto discharge [0.9]; receive and review of Szanto's objection to compensation of Rajah & Tann [0.3].	GLB	1.30	\$481.00	
04/02/20 Email to Candace re objection to Singapore fees and filing response [0.1]; review multiple objections to claims filed by debtor against claims of siblings [0.2].	GLB	0.30	\$111.00	
04/06/20 Receipt and review of Order granting interim compensation to Rajah & Tann [0.2].	GLB	0.20	\$74.00	
04/07/20 Emails from and to Candace re interim compensation order, appeal period, timing on payment to R&T [0.2]; e-mail from and to Candace re abandonment of California appellate action against siblings [0.1].	GLB	0.30	\$111.00	
04/14/20 Telephone cal from Candace re professional fees and report to court on distributions, status and timing on appeals [0.2];	GLB	0.20	\$74.00	

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
04/16/20 Emails from and to Ward Greene re application for supplemental fees [0.1].	GLB	0.10	\$37.00	
04/30/20 Receive and review debtor's letter to court objecting to Trustee's interim report [0.3]; e-mail to Candace re same [0.1].	GLB	0.40	\$148.00	
05/05/20 Receive and review Order re correspondence [0.1].	GLB	0.10	\$37.00	
05/11/20 Receipt and review of debtor's Notice of Demand to Return Assets [0.3].	GLB	0.30	\$111.00	
05/14/20 Emails from and to Nick Henderson re status of matters in Singapore and request for copies of filed pleadings [0.3];	GLB	0.30	\$111.00	
05/18/20 Receipt and review of Court's Order denying debtor's demand to return assets [0.1].	GLB	0.10	\$37.00	
05/20/20 Receipt and review of Szanto motion for relief from Order re objection to trustee's report [0.2].	GLB	0.20	\$74.00	
06/01/20 Receive and review of order denying motion to vacate order [0.1].	GLB	0.10	\$37.00	
06/02/20 Receive and review of debtor's motion to vacate order denying return of debtor's property [0.2].	GLB	0.20	\$74.00	
06/18/20 Emails from and to Candace re fee application for Singapore counsel [0.1].	GLB	0.10	\$37.00	
06/22/20 Receipt and review of order denying Doc 984 [0.2]; e-mail to Claudia Chan re Order denying Doc 984 [0.1].	GLB	0.30	\$111.00	
07/23/20 Receipt and review of Szanto's motion to district court for extension of time to file reply brief and analyze for misrepresentations to court when compared to representations made to Singapore court [0.4]; e-mail to Candace Amborn re concerns about Szanto misrepresentations to courts and inconsistent pleadings filed in different courts [0.4]; e-mails from and to Candace re In re Mastro case and signing consent directives and provisions of contempt order in Szanto case requiring essentially the same, further contempt against Szanto [0.5].	GLB	1.30	\$481.00	
07/24/20 Emails from and to Candace re contacting Jonas Anderson at UST re Szanto misrepresentations to courts [0.1].	GLB		\$0.00	
07/29/20 Review and analyze matters regarding Szanto misrepresentations to courts [0.6]; leave voice mail message for Jonas Anderson at UST office [0.1]; e-mail to Jonas Anderson re history of debtor's actions in this case, appeals and misrepresentations to various courts, contempt against the debtor, and reporting required information as requested by the US Trustee [0.9]; e-mails from and to Jonas [0.1].	GLB	1.70	\$629.00	
08/03/20 Email to Steve Arnot re Szanto filing in Singapore and alleged claim against Steve [0.1].	GLB	0.10	\$37.00	
08/04/20 Telephone call from Jonas Anderson at UST re contempt and reporting required information as requested by the US Trustee, background details, conduct, misrepresentations and lies promulgated by debtor [0.7]; locate affidavits and e-mail to Jonas Anderson re referral to the US Attorney [1.0].	GLB	1.70	\$629.00	
08/06/20 Email to Candace re contempt motion and August 20 hearing in Singapore and decision whether to proceed with motion now [0.2]; e-mail from Candace re proceeding with contempt motion [0.1]; work on contempt motion [1.8].	GLB	2.10	\$777.00	
08/07/20 Continue work on motion for contempt against debtor [1.8].	GLB	1.80	\$666.00	
08/10/20 Review revise and supplement to motion for further contempt and injunctive relief and outline terms for declaration of trustee. Continue work on motion for contempt and revisions to same [1.3]; conference with Russ Garrett re contempt and contempt authority [0.3].	RDG	1.30	\$481.00	
	GLB	1.60	\$592.00	

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
08/11/20 Review and revise contempt motion [0.6]; draft declaration of Candace Amborn in support of motion for contempt order [0.4].	GLB	1.00	\$370.00
08/12/20 Receive and review motions filed by debtor in US District Court with allegations conflicting with allegations made to Singapore courts [0.3]; e-mails to and from Jonas Anderson at UST re same [0.1]; review and revise proposed declaration of Candace Amborn in support of further motion for contempt [0.3]; e-mail to Candace re approval of motion and declaration re contempt [0.1].	GLB	0.80	\$296.00
08/18/20 Emails from and to Candace re motion for contempt and declaration [0.1]; e-mail from Nick Henderson re status [0.1]; e-mail to Nick Henderson re status of mattes in Singapore and motion for contempt [0.1].	GLB	0.30	\$111.00
08/19/20 Email from Lynn re Candace's declaration [0.1]; review and finalize motion for contempt order and supporting declaration for filing [0.2]; revise motion to include LBR 9013-1 notice [0.2]; e-mails from and to Martin Smith re status of case [0.2]; review and finalize revised motion for contempt [0.1]; e-mail to Michael Hogue re contempt motion [0.1].	GLB	0.90	\$333.00
08/20/20 Email from Michael Hogue re filing joinder to contempt motion and e-mail to Candace re same [0.1].	GLB	0.10	\$37.00
08/27/20 Review and analyze debtor's motion to extend time to respond to motion for further contempt [0.7]; e-mail to Michael Hogue re debtor's motion for extension [0.1]; telephone call from Michael Hogue re joinder with contempt motion by HSBC USA and not HSBC Singapore, jurisdiction, and strategy [0.4]; e-mails from and to Michael Hogue re confirming agreement re HSBC USA joinder not subjecting HSBC Singapore to jurisdiction [0.2].	GLB	1.40	\$518.00
08/28/20 Receipt and review of HSBC Bank USA's Joinder to contempt Motion [0.2].	GLB	0.20	\$74.00
08/31/20 Email correspondence to Jonas Anderson at UST re letter from Szanto to Mr. Yam, extortion, and status of Singapore case [0.5]; receipt of order striking joinder [0.1]; work on opposition to motion to extend time to respond to further contempt motion and review communications to Singapore Court [1.6].	GLB	2.20	\$814.00
09/01/20 Work on opposition to Debtor's motion for extension to respond to motion for further contempt [2.1]; receipt and review of Order granting extension of time to debtor [0.1].	GLB	2.20	\$814.00
09/08/20 Email from Claudia Chan re Szanto personal appearances in Singapore [0.1].	GLB	0.10	\$37.00
09/14/20 Initial review of motion to stay all proceedings.  Analysis of response to motion to stay all proceedings.	RDG	0.30	\$111.00
Receipt of Szanto motion to stay proceedings [0.3]; analyze arguments for response to motion for stay and appointment of counsel for civil contempt rather than criminal contempt [0.5];	GLB	0.80	\$296.00
09/16/20 Work on response to motion for stay [0.4];	GLB	0.40	\$148.00
09/17/20 Review motion filed by debtor to stay all proceedings in bankruptcy court, prior motions for extension in both bankruptcy court and District Court, outline objection and prepare objection and declaration for Gary Blackridge.  Review Szanto US District Court motions for stay and recusal of Judge Simon [0.5]; review and revise opposition and declaration to motion for stay of all proceedings [0.6];	RDG	1.60	\$592.00
09/18/20 Review, revise and finalize objection to motion for stay and declaration in support [0.4];	GLB	1.10	\$407.00
	GLB	0.40	\$148.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
09/21/20	Receipt and review of Szanto's response to motion for further contempt [0.4]; e-mail to Steve Arnot re Szanto allegations of "facts" re signing of authorizations [0.2]; e-mail to Russ Garrett re same [0.1];	GLB	0.70	\$259.00
09/22/20	Email from Steve Arnot re confirming false allegations in Szanto response [0.1]; e-mail to Steve Arnot re response and need to testify [0.3];	GLB	0.40	\$148.00
09/28/20	Review Szanto's response and the court's order on Szanto's motion to stay. Receipt and review of Order Denying Motion for Stay pending appointment of Counsel [0.3];	RDG	0.40	\$148.00
09/29/20	Review notice of appeal and initial assessment of response needed in light of court's decision.	RDG	0.30	\$111.00
10/01/20	Review correspondence from court vacating decision and order regarding stay of all proceedings and appointment of counsel and transfer to District, search docket for transfer of Trustee's papers and review rules regarding same. Receive and review of Order Vacating Order denying Debtor's motion for stay and appointment of counsel [0.1]; analyze effect of denial and filing response in USDC [0.2]; receipt and review of order taking no action on Notice filed by Debtor [0.1]; receive and review of multiple notices from court re transmittal of debtor's motion for stay to US District Court [0.3]; investigate transmittal of trustee's objection and debtor's response to US District Court [0.3];	GLB	1.00	\$370.00
10/02/20	Review correspondence from court regarding vacating order and new transmittal to district court. Review Szanto's response to the motion for contempt and request for extension.	RDG	0.30	\$111.00
10/05/20	Receive and review of Judge Simon order denying debtor's motion for counsel in BAP case and distinguishing it from motion in main case and analyze same [0.3]; Review of pending in forma pauperis motions filed by Peter Szanto to determine potential impact on various appeals, and check status of all appeals to determine next administrative steps, including appearances.	GLB	0.30	\$111.00
10/06/20	Review and address new trial date and identify need for one or more witnesses for trial on motion for contempt.	RDG	0.80	\$296.00
10/07/20	Review file and status of Singapore proceeding and advice regarding need for Arnot to testify. Email correspondence to Steve Arnot re hearing on further contempt motion and testifying at video hearing, status of Singapore proceeding and debtor's continual opposition [0.6];	RDG	0.30	\$111.00
10/08/20	Review appellate matters and timing regarding briefing and address extension issue anticipated by debtor. Voicemail from and telephone call from Boris Kukso, DOJ (IRS) re status of proceedings in Singapore, contempt motion and investigation [0.6]; Review of all pending Szanto matters in which Trustee has an interest, memorandum to file regarding deadlines and next steps on each.	GLB	0.60	\$222.00
10/09/20	Review and address spreadsheet of current litigation, issues to be addressed and initial outline of what is needed for evidentiary hearing on contempt. Email to Boris Kukso (DOJ) re status of Singapore matter, case caption and Registrar's Directions [0.1]; telephone call from Candace Amborn re appeals and status of same [0.1];	RLS	1.00	\$325.00
10/13/20	Review correspondence from Court regarding deadlines.	RDG	0.70	\$259.00
			0.20	\$74.00
			0.20	\$74.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
10/13/20	Address appearances for appeal and review matter regarding deadlines.	RDG	0.30	\$111.00
	Review application to employ, total fees incurred, additional appeals and analyze need for amended application to employ and interim fee app [0.5];	GLB	0.50	\$185.00
10/14/20	Review outcome from Singapore and issues following for next steps in local cases.	RDG	0.20	\$74.00
	Email from Peter Szanto re threat [0.1]; e-mail correspondence to Szanto re conferral/threat to seek injunction with Judge Simon to stop contempt motion [0.4]; e-mails from and to Steve Arnot re availability for contempt hearing [0.1];	GLB	0.60	\$222.00
10/16/20	Review correspondence from court regarding trial and directions regarding action to take.	RDG	0.30	\$111.00
10/19/20	Review file and review notices from the court regarding briefing and decisions relating to debtor's motions to stay and for continuances.	RDG	1.10	\$407.00
	Review order from court restarting briefing schedule and review docket regarding hearing in December and timing of information needed.	RDG	0.40	\$148.00
	Review new order granting Szanto's motion for stay in part plus more and directions regarding next steps.	RDG	0.30	\$111.00
	Emails from and to Candace re conversation with Michael Hogue and obtaining documents from Singapore Bank [0.1].	GLB	0.10	\$37.00
	Receive and review of District Court Order staying contempt motion [0.1]; e-mail to Candace re same [0.1].	GLB	0.20	\$74.00
	Assess status of various transfers of motions to district court to determine next steps, memorandum to file regarding same.	RLS	0.40	\$130.00
10/20/20	Review order from motion to stay resent.	RDG	0.10	\$37.00
	Review and analyze District court's order staying amended contempt motion [0.4].	GLB	0.40	\$148.00
	Assess court order staying contempt motion and setting briefing schedule, and strategize with Russ Garrett and Gary Blacklidge regarding same.	RLS	0.70	\$227.50
10/21/20	Directions to associate regarding next steps regarding briefing.	RDG	0.40	\$148.00
	Review correspondence from Szanto regarding his plans to travel to Singapore and assess costs and likely income needed.	RDG	0.30	\$111.00
	Review court's order, review motion and assess withdrawal of request for unconditional incarceration for recommendation to client.	RDG	0.70	\$259.00
	Email correspondence to Russ Garrett re brief requested by Judge Simon on motion to appoint counsel and indigency and debtor's plan to go to Singapore to appeal Singapore ruling [0.3]; analyze need to correct District court record to show contempt motion filed by Trustee and not US Trustee [0.2]; e-mail to Candace re status of District court stay of contempt motion, notices of appearance filed in District Court and correction of record [0.3]; receipt and review of amended order from US District Court [0.1].	GLB	0.90	\$333.00
	Begin preparation of opening brief [0.6]; strategize regarding and begin reviewing cases court is seeking briefing on [1.3]; begin preparation of notices of appearance in contempt motion for appointment of counsel proceeding [0.3]; communicate with court regarding administrative correction to record [0.4].	RLS	2.60	\$845.00
10/22/20	Receipt and review of Szanto's letter to court re dismissal of hearing on contempt motion and analyze same [0.2]; e-mails from and to Russ Garrett re Szanto October 14 e-mail re conferral on threat of motion for injunction [0.2].	GLB	0.40	\$148.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
10/22/20 Assess correspondence filed by Szanto in main bankruptcy proceeding requesting hearing on amended contempt motion be vacated, memorandum to file regarding same.	RLS	0.20	\$65.00
10/26/20 Legal research regarding civil and criminal contempt.	RDG	2.80	\$1,036.00
10/28/20 Review order and analysis of options with trustee regarding withdrawal of criminal contempt answer and request forms	RDG	0.50	\$185.00
Initial review of of part of the court's cases designated for review.	RDG	3.50	\$1,295.00
Conference with Russ Garrett re contempt motion, Judge Simon's order, mandatory incarceration, Szanto's control over complying, and strategy [0.4].	GLB	0.40	\$148.00
Strategize with Russ Garrett regarding supplemental briefing requested from District Court on Szanto's motion to appoint counsel.	RLS	0.30	\$97.50
10/29/20 Continue legal research regarding civil and criminal contempt prepare initial sections of briefing.	RDG	2.50	\$925.00
Review of remaining cases identified by the district Court for review.	RDG	3.80	\$1,406.00
Continue legal research regarding civil contempt and right to counsel; outline fundamentals for civil contempt standards.	RDG	6.40	\$2,368.00
10/30/20 Add to legal research regarding civil contempt cases and right to counsel.	RDG	3.20	\$1,184.00
10/31/20 Prepare briefing requested by the court on Szanto regarding contempt.	RDG	3.50	\$1,295.00
Summarize details of each of the relevant cases identified for use in briefing.	RDG	3.60	\$1,332.00
11/01/20 Review forms 1 and 2.	RDG	0.30	\$111.00
11/02/20 Add to and revise briefing on contempt issues.	RDG	4.50	\$1,665.00
Review Szanto's motion for extension filed in wrong case.	RDG	0.20	\$74.00
Review and revise and supplement memorandum regarding civil contempt and right to counsel.	RDG	1.10	\$407.00
Forward briefing and recommendations.	RDG	0.50	\$185.00
Receive and review debtor's motion for extension of district court case No.20-mc-1070 re briefing on appointment of counsel for contempt matter [0.5]; confer with Russ Garrett re same and re contacting the court re filing in correct case and due dates of briefs [0.2]; receipt and review and debtor's amended motion in correct case [0.1]; review brief re appointment of counsel [0.7].	GLB	1.50	\$555.00
11/03/20 Review correspondence from court regarding new decision on new dates for briefing based upon Szanto's motion for answer extension and directions to paralegal regarding same.	RDG	0.40	\$148.00
Receipt and review of Judge Simon order re ECF privilege for debtor re motion for appointment of counsel [0.1]; receive and review of Judge Simon order re District Court mistake and revised scheduling order [0.1].	GLB	0.20	\$74.00
11/09/20 Telephone conference with Gary Blackridge regarding background on his dealings with debtor and ability to pay evident from debtor's filings with the courts.	RDG	0.40	\$148.00
Review opinion and order of the court on JP Morgan issue.	RDG	0.40	\$148.00
Review information from Szanto's former submissions in apparent conflict with his application for IFP.	RDG	0.40	\$148.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
11/09/20 Receipt and review of In forma pauperis application filed in wrong case [0.2]; e-mail same to Russ Garrett [0.1]; receipt and review of in forma pauperis application filed in proper case [0.1]; analyze application and memorandum re comments and questions on application in conflict with representations in other pleadings [0.4]; e-mails from and to Steve Arnot re status in Singapore and contempt hearing [0.3]; pull Szanto Singapore correspondence and e-mail to Russ for response to indigency claim [0.6].	GLB	1.70	\$629.00
Review of all pending matters to determine status and any changed deadlines [0.9]; pull example pleadings from multiple matters to assist in response to Szanto's application to proceed in forma pauperis [0.6].	RLS	1.50	\$487.50
11/12/20 Assemble documents and review Szanto's multiple applications for appointment of counsel and financial status.	RDG	1.30	\$481.00
11/13/20 Review documents filed by debtor tending to refute debtor's current financial status.  Email to Russ Garrett re recent motion filed by Szanto alleging that he is working to make extra money that is not disclosed in his application for IFP [0.1];  Strategize with Russ Garrett regarding response to in forma pauperis filings from Szanto.	RDG	0.50	\$185.00
11/16/20 Prepare draft motion, affidavit and certificate of service for trustee's response to debtors IFP application.  Receive and review Szanto's brief in response to Judge Simon's order asking for briefing on the right to counsel in the motion for contempt, analysis of same and recommendations regarding no further briefing or response absent court request.  Emails from and to Russ re response to application for IFP [0.1]; review exhibits and revise response and declaration of GLB in support of response and e-mail to Russ re same [0.8].  Provide direction to staff regarding form of pleadings for response to debtor's application to proceed in forma pauperis.	RDG	2.00	\$740.00
11/17/20 Receive and review of Szanto's brief filed in District Court re appointment of counsel [0.9]; review Szanto's second motion for extension in BAP appeal [0.3]; review and analyze Szanto's motion requesting leave to reply and for sanctions and to strike trustee's response [0.4]; receive and review of order from Judge Simon on Szanto motion and placing declaration under seal [0.1]; e-mail correspondence to Claudia Chan at Rajah & Tann re confirming Szanto's representation of Singapore law with respect to disclosure of filings in Singapore Courts [0.4].  Review status of pending matters to determine next steps, provide direction to staff regarding same [0.5]; assess motion to strike filed by Szanto, memorandum to file regarding same [0.2]; assess ruling on motion to strike and provide direction to staff regarding same [0.2].	GLB	0.90	\$333.00
11/18/20 Email from Claudia Chan re Singapore law with respect to Szanto's arguments that Singapore law requires filing to be under seal and analyze whether to seek and file a declaration of Singapore law with Judge Simon [0.3]; e-mail to Claudia Chan re affidavit on Singapore law re disclosure of court filings in Singapore courts and preparation of affidavit [0.4].	RLS	0.70	\$292.50
11/19/20 Emails from and to Claudia Chan re affidavit on Singapore law and timing [0.1].	GLB	0.10	\$37.00
11/20/20 Assemble remainder of documents proposed for consideration before contempt hearing.	RDG	0.40	\$148.00
11/21/20 Begin review of documents for contempt hearing.	RDG	1.20	\$444.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
11/22/20 Email to Claudia Chan re affidavit of Singapore counsel re Singapore law [0.1]; e-mail from Claudia Chan re draft declaration from Yam and review and revise same [0.4]; e-mail correspondence to Claudia Chan re revisions to draft declaration re Singapore law and minor revisions [0.2].	GLB	0.70	\$259.00
11/23/20 Review and address motion for extension in Yankee trust case and evaluate issues in main case involving contempt issues.	RDG	0.50	\$185.00
Review BAP brief filed by Szanto and relationship to contempt and main case issues.	RDG	0.40	\$148.00
Review Szanto's motion and supporting documentation for stay contempt proceedings and evaluate response.	RDG	0.60	\$222.00
Review declaration and evaluate use of declaration in light of Court's ruling and advice regarding same.	RDG	0.70	\$259.00
Email from Claudia re signed declaration re Singapore law re disclosure of pleadings [0.1]; receipt and review of Szanto's motion for a stay of contempt hearing [0.3]; analyze merits of filing Singapore declaration to show Szanto's misrepresentations of Singapore law to Judge Simon [0.4].	GLB	0.80	\$296.00
Assess Szanto motion to stay hearing set on contempt motion and order on same, memorandum to file regarding same.	RLS	0.30	\$97.50
11/24/20 Email to Lynn at Candace's office re filing interim fee app [0.1]; telephone call from Candace re status of case, various matters and filing interim fee app [0.8].	GLB	0.90	\$333.00
11/30/20 Begin work on interim fee application for Jordan Ramis [0.3].	GLB	0.30	\$111.00
12/02/20 Review appeal and recommendations regarding compliance and issues related to Szanto's lack of compliance and continued requests for extension without conferral.	RDG	0.40	\$148.00
12/03/20 Outline action needed in order to prepare for evidentiary hearing on contempt and directions to paralegal regarding need to redirect form to debtor.	RDG	0.90	\$333.00
12/07/20 Review court's order on contempt and right to appointed counsel and address current status.	RDG	0.80	\$296.00
Receipt and review of order denying Szanto's motion for appointment of counsel for motion for further contempt [0.3]; e-mail to Candace re same [0.1].	GLB	0.40	\$148.00
12/08/20 Review both BAP appeals pending extension requests and due dates for opening briefs and further invitation for Szanto to file a motion for appointment of counsel.	RDG	0.40	\$148.00
Review order and outline information needed answer d directions to paralegal regarding action to take.	RDG	0.40	\$148.00
Receipt and review of Notice of rescheduled virtual hearing and order re same [0.3]; e-mails from Russ and to Russ re attempt to get Szanto to sign authorizations to obviate need for hearing [0.1]; e-mail to Steve Arnot re rescheduled hearing date, Simon order and efforts to get Szanto to sign authorizations [0.2].	GLB	0.60	\$222.00
12/09/20 Assess court orders on contempt hearing and provide direction to staff regarding follow up on same.	RLS	0.30	\$97.50
12/10/20 Review court's order and attachments and identify changes needed since new trustee and passage of time.	RDG	0.30	\$111.00
Emails to and from creditor's attorney Nick Henderson re status of case in Singapore and here [0.4]; e-mail from Steve Arnot re preparation for contempt hearing and e-mail to Steve Arnot re copies of documents for review, allegations of debtor and issues [0.6]; receipt and review of order regarding contempt hearing [0.1].	GLB	1.10	\$407.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
12/11/20	Initial review and analysis of Szanto's brief on denial of discharge.	RDG	0.70	\$259.00
	Follow up on status of contempt proceeding, and review response brief filed in discharge appeal to determine if any follow up needed.	RLS	0.60	\$195.00
12/14/20	Review latest on contempt matter and address dates and organize preparation and pull letter debtor did not sign earlier.	RDG	0.80	\$296.00
	Receive voice mail message from Szanto [0.1]; telephone call to Peter Szanto re hearing on contempt, Singapore proceedings appeals and efforts towards resolution [1.0]; e-mail to Russ Garrett re conversation with Szanto re contempt hearing, HSBC Bank and Singapore matter [0.3]; telephone call to Szanto re efforts to work out a compromise on contempt matter [0.6].	GLB	2.00	\$740.00
	Assess recently filed JP Morgan Chase/Bank of America notice of appeal to determine if any impact on multiple other pending appeals, memorandum to file regarding same.	RLS	0.20	\$65.00
12/15/20	Review correspondence from debtor regarding depositions and advice regarding same.	RDG	0.30	\$111.00
	Review contempt order and exhibits, address changes and directions to paralegal regarding information to obtain.	RDG	0.40	\$148.00
	E-mail to trustee requesting information and updating on contempt status.	RDG	0.20	\$74.00
	Exchange e-mails with trustee regarding timing of disclosure of bank info on form for Szanto to sign.	RDG	0.20	\$74.00
	Exchange e-mails with trustee regarding timing of putting bank account information on the form for the authorizations.	RDG	0.20	\$74.00
	Email from Szanto re conversation and proposal for depositions and Zoom conference and analyze same [0.2]; e-mail to Szanto in response re settlement discussions, proposal to globally resolve case and Zoom conference [0.5]; conference with Russ Garrett re depos and authorization forms for HSBC Bank Singapore and completing with Candace's info [0.2]; e-mail to Michael Hogue re status of Singapore interim stay and appeal, status of contempt hearing and conversation with Szanto and obtaining authorization forms for HSBC Bank Singapore to complete with current trustee info [0.3].	GLB	1.20	\$444.00
12/16/20	Review orders for video hearing and directions to paralegal regarding documents needed and information needed.	RDG	0.40	\$148.00
	Review Order dated October 8th ruling in trustee's favor and court's letter of Nov 10th extending time for Szanto to file appeal and related documents to contempt motion.	RDG	0.40	\$148.00
	Review decision of court in Singapore related to lifting interim stay and follow up for HSBC form for contempt matter.	RDG	0.40	\$148.00
	Review correspondence from Michael Hogue regarding HSBC disclosures and initial review of documents provided in connection with contempt matter and disclosures.	RDG	0.60	\$222.00
	E-mail to trustee regarding status and pending hearing for contempt.	RDG	0.10	\$37.00
	Phone conference with Russ Garrett re preparation for contempt hearing, status in Singapore and with HSBC Bank and conversation with Szanto [0.5]; e-mails from and to Candace re strategy [0.1]; e-mail from Michael Hogue re HSBC Singapore bank account statements and records [0.1]; review HSBC bank records [1.1]; e-mail to Candace re Szanto's Singapore account, and subsequent transfers [0.2]; e-mail correspondence to Michael Hogue re Bank's assistance in identifying where transfers of funds were from, and were to, that depleted the Singapore account [0.4];	GLB	2.40	\$888.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
12/17/20	Review and analysis of Szanto's request for set over of the contempt hearing and suggestion of damages.	RDG	0.30	\$111.00
	Email from Robyn re deadline for witnesses and exhibits for contempt hearing [0.1]; e-mail to Russ re same and other violations for opposing the trustee and increasing admin expenses [0.3];	GLB	0.40	\$148.00
	Assess case deadlines related to upcoming contempt hearing, memorandum to file regarding timing of exhibits needed for hearing.	RLS	0.30	\$97.50
12/18/20	Follow up for HSBC updated document and review most recent opinion and order from Judge Simon regarding appeal related to siblings and transfers.	RDG	0.50	\$185.00
	Conference with Michelle re preparation for contempt hearing, exhibits and witnesses and background [0.5]; e-mail to Steve Arnot re Order establishing procedures for video hearing and status in Singapore [0.4];	GLB	0.90	\$333.00
	Review order and opinion from Szanto v. Szanto matter to determine if any impact or of any use to current and future Szanto appeals (NO CHARGE).	RLS	0.30	N/C
12/20/20	Review correspondence from Arnot regarding testimony and updates for testimony regarding opening Singapore account.	RDG	0.20	\$74.00
12/21/20	Email from Steve Arnot re preparation for hearing and transfers from account [0.1]; e-mail to Steve Arnot re copy of account application and preparation for hearing [0.2]; receive and review of debtor's motion to stay contempt hearing [0.4];	GLB	0.70	\$259.00
	Assess multiple new court filings stemming from Szanto appeals and extensions, to determine if any follow up needed, memorandum to file regarding same.	RLS	0.30	\$97.50
12/22/20	Emails from and to Robyn re responding to debtor's motion for extension to conduct depositions [0.2]; telephone call from Russ Garrett re contempt hearing [0.2]; e-mail to Michael Hogue re updated authorization form, identifying transferees, and search for accounts for Susan Szanto [0.1];	GLB	0.50	\$185.00
	Strategize with Gary Blackridge regarding Szanto request to extend or stay contempt proceeding pending.	RLS	0.40	\$130.00
12/23/20	Telephone call from Peter Szanto re withdrawing contempt motion, Susan Szanto's death, grieving, Singapore accounts, administration of estate, Susan's appeal, and background [0.9]; e-mail to Russ and Robyn re conversation with Szanto [0.2];	GLB	1.10	\$407.00
12/24/20	Receipt and review of Debtor's correspondence to court re Susan Szanto's death and his inability to prepare for contempt hearing [0.1]; Email to Russ Garrett re same and related conversation with Szanto [0.3];	GLB	0.40	\$148.00
12/26/20	Exchange e-mail with attorney Blackridge and confirm status and confirm that HSBC has still not provided form and e-mail Mike Hogue, counsel for HSBC regarding status, urgency and reason for need for form.	RDG	0.40	\$148.00
12/27/20	Review correspondence from Mike Hogue, counsel for HSBC bank and review form provided and directions to paralegal regarding next steps.	RDG	0.30	\$111.00
12/28/20	Emails from and to Candace re interim application [0.1]; receive and review order requiring response to Szanto communication re death of Susan Szanto [0.1]; conference call with Russ Garrett and Robyn Stein re response due to court by 31st to Szanto communication [0.2]; e-mails from and to Candace re death certificate for Susan and conversation with Jonas Anderson at UST re same [0.1]; prepare application for exemption [0.3];	GLB	0.80	\$296.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
12/28/20	Assess court order requesting response to Szanto correspondence regarding alleged death of spouse, strategize with Gary Blackridge and Russ Garrett regarding same, and provide direction to staff regarding same [0.9].	RLS	0.90	\$292.50
12/29/20	Receipt and review of Order denying stay of contempt hearing [0.1]; Provide direction to staff regarding preparation of response to contempt hearing extension request and filing of attorney appearance [0.3]; assess court order on motion to stay contempt proceeding to conduct discovery and provide direction to staff regarding follow up same [0.2].	GLB	0.10	\$37.00
12/30/20	Review and revise documents for debtor to sign consistent with court order and draft letter to debtor regarding same and pending motion for contempt. Review correspondence from debtor to court, court's order on debtor's motion to stay and begin drafting in response to debtors request for indeterminate set over of hearing on contempt. Review debtor's motion for setover and issues raised including separate property issue and indispensable party issue alleging death of Susan Szanto and prepare response to same. Review and revise HSBC form fields and review and revise letter to Szanto regarding same. Voice mail message from and telephone call to Peter Szanto re Susan Szanto death and contempt hearing, Singapore accounts, transfers and threats [0.5]; telephone call from Russ re Szanto conversation and sending authorization forms [0.2];	RLS	0.50	\$162.50
12/31/20	Review and revise response to debtor's motion for indefinite stay of contempt matter. Receive and review debtor's motion to stay contempt proceedings filed in District Court and analysis of need (or not) to respond in light of the fact that that matter is pending in the bankruptcy court. Review district court's response to Szanto's motion to the district court for a stay on the contempt matter in bankruptcy court. Review background regarding community property issues addressed by the bankruptcy court and recommendations regarding same. Receipt, review and analyze Szanto's motion in District Court to Stay contempt hearing [0.7]; e-mail to Candace Amborn re Szanto motion [0.1]; e-mail to Steve Arnot re Szanto motion [0.1]; review and revise response to debtor's request for indeterminate setover of contempt hearing and e-mail to Russ Garrett re revisions to same re community property [1.0]; telephone call from Russ re revisions to response [0.2]; further revisions to response and e-mail to Russ and Patricia re same [0.8]; receipt and review of Judge Simon's order denying stay of contempt hearing [0.1]; telephone call from Candace Amborn re response to request for setover [0.1]; Assess new motion to stay contempt proceedings and order on same, memorandum to file regarding same and provide direction to staff regarding follow up on same.	RDG	0.90	\$333.00
		RDG	1.80	\$666.00
		RDG	1.40	\$518.00
		RDG	0.60	\$222.00
		GLB	0.70	\$259.00
		RDG	1.30	\$481.00
		RDG	0.30	\$111.00
		RDG	0.10	\$37.00
		RDG	0.30	\$111.00
		GLB	3.10	\$1,147.00
		RLS	0.50	\$162.50

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blackridge, Gary L.	1.00	\$370.00	N/C
GLB	Blackridge, Gary L.	102.60	\$370.00	\$37,962.00
RDG	Garrett, Russell D.	78.80	\$370.00	\$29,156.00

## Timekeeper Recap

T.K.	Name	Hours	Rate	Amount
RLS	Stein, Robyn L.	8.60	\$300.00	\$2,580.00
RLS	Stein, Robyn L.	0.30	\$325.00	N/C
RLS	Stein, Robyn L.	13.60	\$325.00	\$4,420.00
<b>Sub-Total Fees:</b>				<b>\$74,118.00</b>

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 12, 2021

Client ID 54568-77435 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Registration of Bankruptcy Court Orders in Singapore and Investigation of Transfers to Singapore

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
03/25/19	Multiple e-mails from Arnot re Singapore proceeding re history and status and review same and e-mails to Arnot re same and clarifications [1.2].	GLB	1.20	\$444.00
03/26/19	Receive and review e-mails between Danitza Hon and trustee re Singapore matter [0.1]; receipt and review of Arnot's resignation as trustee [0.1].	GLB	0.20	\$74.00
04/02/19	Email from Danitza Hon re resignation and appointment of trustee [0.1]; e-mail to Danitza re resignation of Steve Arnot and appointment of Candace Amborn as successor Trustee [0.3].	GLB	0.40	\$148.00
04/04/19	Emails from Danitza Hon re warrant to act, ex parte substitution and affidavit and review same [0.3]; e-mail to trustee re affidavit and warrant to act and timing [0.1].	GLB	0.40	\$148.00
04/08/19	Receipt and review of e-mail from Danitza Hon re results of April 8 hearing and copies of debtor's Singapore pleadings [0.4].	GLB	0.40	\$148.00
04/12/19	Review e-mail from Danitza Hon re documents needed in Singapore [0.2]; locate documents requested by Danitza [0.3]; e-mail to Steve Arnot re location of documents [0.1].	GLB	0.60	\$222.00
04/15/19	Review file to locate e-mails from Steve Arnot to Danitza Hon, for copies of documents requested [0.3]; e-mail to Danitza Hon re documents requested for Singapore hearing [0.2].	GLB	0.50	\$185.00
04/16/19	E-mail to Danitza re Opinion letter for disallowing Claim 14 [0.2].	GLB	0.20	\$74.00
04/22/19	Receipt and review of debtor's motion to disqualify Singapore counsel [0.9]; email to Trustee re same [0.1].	GLB	1.00	\$370.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
04/25/19 Email from Danitza Hon re order substituting Candace Amborn for Stephen Arnot [0.1]; e-mail to Dantiza Hon re same [0.1]; review e-mail from Danitza Hon re statement from Singapore counsel and review application to employ and file re employment terms [0.7]; e-mail to Steve Arnot re terms of employment of Singapore counsel [0.2]; e-mail from Steve Arnot re engagement of Singapore counsel [0.1]; e-mails from and to Trustee re sample application to Singapore counsel [0.1]; e-mails from and to Trustee re sending sample application to Singapore counsel [0.2]; review and analyze terms of engagement of Singapore counsel and draft e-mail correspondence to Singapore counsel re applying for court approval for compensation with sample fee application [1.1].	GLB	2.30	\$851.00
04/26/19 Email from Danitza re fee app [0.1].	GLB	0.10	\$37.00
04/29/19 Work on Trustee's response to debtor's motion to disqualify Singapore counsel [3.1].	GLB	3.10	\$1,147.00
04/30/19 Revise and continue work on response to debtor's motion to disqualify Singapore counsel [1.5].  Revise response to Debtor's motion to disqualify Singapore counsel [0.2].	GLB	1.50	\$555.00
05/01/19 Revise response to debtor's motion to disqualify Singapore counsel [0.3]; email to Trustee re approval of response to debtor's motion to disqualify Singapore counsel [0.2].	GLB	0.50	\$185.00
05/06/19 E-mail from Danitza re detailed narrative breakdown and e-mail to Danitza re same [0.2].	GLB	0.20	\$74.00
05/07/19 Receive e-mail from Danitza Hon re filing by Szanto in Singapore [0.1].	GLB	0.10	\$37.00
05/10/19 Review debtor's Singapore filings provided by Danitza Hon [0.9]; e-mail to Danitza re November 27, 2017 hearing date and subsequent orders and timing of transfers [0.6].	GLB	1.50	\$555.00
05/15/19 Review e-mail from Dantiza Hon and draft affidavit of Candace Amborn and proposed exhibits for filing in Singapore [0.6]; review docket and history of contempt pleadings for e-mail response to Danitza and draft e-mail to Danitza Hon re contempt proceedings and draft affidavit for Candace Amborn [0.9].	GLB	1.50	\$555.00
05/16/19 Receive e-mail from Danitza Hon re questions regarding accounts and property of the estate [0.1]; review revised affidavit for Amborn [0.3]; review Code and analyze issues on property of estate for response to Singapore counsel's questions [0.6].	GLB	1.00	\$370.00
05/17/19 Analyze property of the estate issues [0.6]; e-mail from Danitza re second draft of affidavit [0.2]; e-mail to Danitza re answers to questions posed re property of the estate and court's determination that transfers were made to Singapore [0.7]; e-mail from and e-mail to Candace re questions about Singapore affidavit [0.4]; telephone call from Candace re revisions to affidavit for Singapore matter [0.6].	GLB	2.50	\$925.00
05/20/19 Email from Danitza Hon re October 2 order and registering in Singapore [0.1]; email to Danitza re registering October 2 order in Singapore [0.3]; telephone call from Candace re sending Affidavit to Singapore and version with October 2 order [0.1]; e-mail to Danitza re alternative versions of affidavit and applying for the October 2 order entry in Singpore anyway [0.4].	GLB	0.90	\$333.00
05/21/19 Email from Danitza Hon re explanation of lodging of orders in Singapore court and reasons and strategy with HSBC Bank [0.1]; e-mail to Danitza re same [0.1].	GLB	0.20	\$74.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
05/30/19 Emails from and to Danitza re debtor's representation to Singapore court regarding appeal [0.2]; review and analyze notice of appeal and deadline for filing appeal [0.3]; e-mail to Danitza re Notice of appeal, order denying rule 60(b) motion and untimeliness of appeal [0.4].	GLB	0.90	\$333.00
05/31/19 Receive, review and analyze e-mail from Danitza re results of Singapore hearing [0.3]; e-mail to Danitza re appeal of conversion order and explanation of untimeliness and Arnot affidavit and trustee's right to review the records despite the pending appeal [0.4].	GLB	0.70	\$259.00
06/10/19 Telephone call from Michael Hogue re status hearing and status in Singapore and Szanto appeals [0.3]; review Singapore case briefing schedule and e-mail to Danitza Hon re status of Szanto's filing affidavit on June 5 [0.2].	GLB	0.50	\$185.00
06/11/19 Review debtor's affidavit filed in Singapore case [0.8]; e-mail to Michael Hogue re debtor's allegations that Singapore dollars are in New York bank account [0.1].	GLB	0.90	\$333.00
06/12/19 E-mail from Danitza Hon re draft affidavit for filing in Singapore matter and review and analyze same [0.8]; e-mail to Danitza re comments on affidavit and responses to inquiries by Singapore counsel in filing its response affidavit [0.8]; e-mails from and to Candace re filing fee app for Singapore counsel [0.2].	GLB	1.80	\$666.00
06/13/19 Email from Danitza Hon re revised affidavit and review same [0.4]; pull motion and response re removal of trustee and e-mail Danitza [0.4].	GLB	0.80	\$296.00
06/18/19 E-mail from Danitza Hon re revised affidavit for Amborn [0.1]; review revised affidavit [0.2]; e-mail to Danitza re same [0.1]; e-mail to Candace Amborn's assistance re signing revised affidavit [0.1].	GLB	0.50	\$185.00
06/20/19 Email from Danitza re new hearing date in Singapore [0.1]; e-mail to Danitza re clarification on hearing [0.1].	GLB	0.20	\$74.00
06/26/19 Review e-mail from Danitza Hon re e-mail from Szanto re meeting and court hearing in September [0.2]; e-mail to Danitza re same and IRS appellee's brief, status of appeal and maintaining course [0.7].	GLB	0.90	\$333.00
08/06/19 Email from Danitza Hon re status of appeal on conversion order and hearing date on Singapore matter [0.1]; e-mail to Danitza re trustee's joinder response re appeal of conversion order and status of appeal/hearing [0.4]; e-mail to Danitza re confirming no hearing has yet been set on the appeal of the conversion order [0.1].	GLB	0.60	\$222.00
08/07/19 Emails from and to Danitza Hon re setting over hearing in Singapore and potential hearing date on conversion appeal [0.1].	GLB	0.10	\$37.00
08/26/19 Email from Danitza Hon re status of appeal [0.1]; e-mail to Danitza re Szanto's motion for extension of time to file reply [0.1]; e-mail to Danitza re status with Judge Simon and copies of motion and opposition re extension [0.1]; e-mail to Danitza Hon re order granting Szanto's motion for extension [0.1].	GLB	0.40	\$148.00
08/29/19 Emails from and to Danitza Hon re adjournment of Singapore hearing based on delay/extension in Szanto filing reply [0.5].	GLB	0.50	\$185.00
09/09/19 Emails to and from Danitza re adjournment of Singapore hearing [0.1]; e-mail from Danitza re filings in Singapore court for extension and review Szanto's opposition to extension [0.3].	GLB	0.40	\$148.00
10/16/19 Emails from and to Claudia Chan re IRS claim objection [0.1];	GLB	0.10	\$37.00
11/04/19 Email to Claudia Chan (Singapore counsel) re status of appeal of conversion order [0.2].	GLB	0.20	\$74.00
11/07/19 Emails from and to Claudia Chan re status of appeal of conversion order, strategy re Singapore hearing and debtor's reply to appeal of conversion order [0.3].	GLB	0.30	\$111.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
11/18/19 Email from Claudia Chan re Szanto's request to set over hearing and request for vexatious litigant ruling [0.1]; review Szanto's request for setover [0.1]; e-mail to Nick Henderson re copy of California holding that Szanto is a vexatious litigant [0.2]; e-mail to Claudia Chan re vexatious litigant docket and comments on Szanto's letter to Singapore Court [0.8]; e-mail from Nick Henderson re Order re vexatious litigant and review order [0.2]; e-mail to Nick re order re Ninth Circuit frivolous appeals [0.1]; e-mail from Nick re 9th Circuit pre-filing review orders and review same [0.2]; e-mail to Claudia Chan re California vexatious litigant order, explanation of difference between federal and state law and appeals of bankruptcy court orders, and pre-filing review orders issued by Ninth Circuit [0.6].	GLB	2.30	\$851.00
11/22/19 Email from Claudia Chan re court's adjournment of hearing to January 21, 2020 [0.1].	GLB	0.10	\$37.00
11/28/19 Email from Claudia Chan re Szanto correspondence and threats re release of funds from HSBC Bank Singapore for wife's medical treatment and review Szanto's correspondence to Singapore counsel re same [0.2]; e-mail to Claudia Chan re same and Szanto's veracity and findings in adversary proceeding against siblings [0.3].	GLB	0.50	\$185.00
11/29/19 Emails from and to Candace Amborn re providing opinion from Szanto sibling adversary proceeding to show veracity of Szanto [0.2].	GLB	0.20	\$74.00
12/02/19 Email from Claudia Chan re Szanto's e-mail with correspondence purportedly from HSBC Bank [0.2]; e-mail to Claudia Chan re same and instructions to Szanto to contact trustee, memorandum opinion in adversary proceeding re Szanto's veracity and contacting counsel for HSBC Bank [0.4]; e-mail correspondence to Michael Hogue (attorney for HSBC Bank) re Szanto's contacting Rajah & Tann with correspondence allegedly from HSBC Bank requesting release of funds [0.5]; e-mail to Debtor re freeze on Singapore accounts, Rajah & Tann authority [0.8]; e-mails from and to Michael Hogue re purported e-mail from HSBC Bank [0.1]; e-mail to Claudia Chan re Michael Hogue's e-mail re purported e-mail from HSBC Bank [0.2].	GLB	2.20	\$814.00
12/03/19 Emails to and from Steve Arnot re background on freezing of Singapore accounts [0.2].	GLB	0.20	\$74.00
12/09/19 Email from Szanto re Rule 11 threat [0.1]; e-mails from and to Candace re Szanto e-mail [0.1]; e-mail from Claudia Chan re letter from Szanto to court re release of funds and review and analyze same and proposed letter to court with attachments [0.8]; detailed e-mail to Claudia Chan re HSBC Bank adversary proceeding, freezing accounts, Szanto's allegations and proposed letter to court [0.9]; e-mail to Michael Hogue re e-mail allegedly from Bank [0.1]; telephone call from Michael Hogue re false e-mail from debtor, criminal contempt and wire fraud [0.2]; review statutes on criminal contempt and wire fraud [0.3]; e-mail to Candace re conversation with Michael Hogue re bankruptcy crimes and wire fraud [0.2].	GLB	2.60	\$962.00
12/10/19 Email to Claudia Chan re e-mail fabricated by Szanto to appear that it was from HSBC Bank [0.1]. Email from and to Yam Wern Jhien re recommendation that HSBC Bank file police report due to debtor's false e-mail [0.1]; e-mail to Michael Hogue (attorney for HSBC Bank re same [0.1].	GLB	0.10	\$37.00
12/17/19 Email from Claudia Chan re status of Szanto's application to the court for release of funds and review court's response and e-mails to and from Szanto and Rajah & Tann re same [0.7]; e-mail to Claudia re same and responses to Szanto and status of appeal of conversion order [0.4].	GLB	0.20	\$74.00
		1.10	\$407.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
01/08/20	Email from Claudia Chan re order for relief from the stay, status of appeal of conversion order and change of address for Singapore counsel [0.1]; e-mail to Claudia Chan re same and order denying debtor's second attempt at disqualifying Singapore counsel [0.4]; e-mail from Candace Amborn re no objection to Bank's legal department contacting Singapore counsel [0.1]; e-mail to Michael Hogue (HSBC counsel) re consent for Bank's legal department to contact Trustee's Singapore counsel [0.4]; e-mail to Claudia Chan re consent for Bank legal dept to contact Singapore counsel [0.1].	GLB	1.10	\$407.00
01/15/20	Email from Claudia Chan re written submissions to court for Jan 21 hearing [0.1]; review supplemental written submissions and edit with comments [0.5]; e-mail to Claudia re written submissions and comments [0.4];	GLB	1.00	\$370.00
01/17/20	Email from Claudia re filings in Singapore for Jan 21 hearing [0.1]; review filings in Singapore proceeding [0.5].	GLB	0.60	\$222.00
01/20/20	Email from Claudia Chan re Szanto filings with court and review same [0.4]; e-mails from and to Yam Wern-Jhien re Szanto's filing of withdrawal from bankruptcy [0.3].	GLB	0.70	\$259.00
01/21/20	Email from Claudia Chan re results of hearing and need for expert on bankruptcy laws [0.2]; e-mails from and to Candace Amborn re results of hearing and candidates for expert opinion [0.2]; e-mail from Candace experts [0.1]; e-mail to Candace on selection of expert and sending Szanto Singapore pleadings to Martin Smith [0.2]; e-mails from and to Candace [0.1]; e-mail to Claudia re expert affidavit [0.2]; email from Yam Wern-Jhien re answers to questions [0.1].	GLB	1.10	\$407.00
01/23/20	Email to Claudia Chan and Yam Wern-Jhien re Judge Simon ruling on appeal of conversion order [0.1].	GLB	0.10	\$37.00
01/24/20	Email to Candace re status with Judge Alley acting as expert [0.1]; e-mails from and to Candace re no response from Judge Alley and consideration of David Criswell for expert [0.2]; e-mail from Candace re Judge Alley could not do [0.1]; conference with Russ Garrett re potential expert candidates and leave voice mail message for Candace Amborn re same [0.4].	GLB	0.80	\$296.00
01/27/20	Emails from Candace to David Criswell re expert [0.1]; telephone call from David Criswell re case background, Singapore issues and expert opinion [0.8]; e-mail to David Criswell re correspondence from Singapore counsel re expert opinion needed [0.2]; e-mail from David re disclosure [0.1]; e-mail to Yam and Claudia re disclosure of unrelated case [0.1].	GLB	1.30	\$481.00
01/28/20	Emails from and to Yam re expert [0.1]; e-mail from David Criswell re draft affidavit [0.1]; e-mail to David Criswell re e-mails from Singapore counsel [0.1]; e-mail to Yam Wern-Jhien re expert, documents to review and arranging phone conference [0.2]; review and analyze draft affidavit of expert David Criswell [0.4]; e-mail to David Criswell re comments on draft affidavit [0.4]; e-mail to David re statement of independence in affidavit [0.1]; e-mail from David re revised affidavit and review and revise same [0.3]; e-mail to David re same [0.1]; e-mail to Yam Wern-Jhien re draft Criswell affidavit [0.1]; telephone call from Candace re Criswell affidavit and suggested changes [0.4].	GLB	2.30	\$851.00
01/29/20	Email from Claudia re Criswell affidavit, list of documents, and phone conference [0.1]; e-mail to Claudia re phone conference [0.1]; e-mail to David Criswell re copies of cases to Singapore with affidavit [0.1]; e-mail from David Criswell re revised affidavit and review same [0.2].	GLB	0.50	\$185.00
01/30/20	Email from Claudia Chan re revised affidavit for Criswell and review same, opinion and CV [0.5]; Conference call with Yam Wern-Jhien, Claudia Chan and David Criswell re expert opinion [0.8]; e-mail to Yam re ruling against Susan Szanto POC and community property [0.1].	GLB	1.40	\$518.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
01/31/20 Email from Claudia Chan re revisions to expert opinion and review same [0.2].	GLB	0.20	\$74.00	
02/03/20 Receive and review of Criswell's final affidavit of expert opinion [0.1]; e-mail to Claudia and Yam re Judge Simon's Order ruling on Szanto's argument of withdrawal from bankruptcy [0.1].	GLB	0.20	\$74.00	
02/14/20 Email from Claudia Chan re emergency filing by Szanto re disregarding expert affidavit, alleged fraud on the court arising from the denial of discharge trial [0.2]; review Szanto emergency filing in Singapore [0.5]; e-mails from and to Candace Amborn re approval of Singapore counsel's recommendations [0.1]; e-mail to Claudia re clarifications and responses to Szanto's emergency motion [0.5]; e-mail to Martin Smith re Szanto allegations of fraud about adversary proceeding trial [0.4]; e-mails from and to Martin Smith re explanation regarding his not testifying at trial and Szanto's claim of fraud [0.2]; e-mail to Claudia Chan re e-mail from Martin Smith and explanation re Szanto's claim of fraud [0.1].	GLB	2.00	\$740.00	
02/17/20 Email from Claudia Chan re Szanto's rejected motion in Singapore for an abatement order [0.3]. Emails from and to David Criswell re motion to disqualify Criswell [0.1].	GLB	0.30	\$111.00	
02/18/20 Email from Claudia Chan re Debtor's Motion to examine David Criswell [0.2]; e-mail same to David Criswell [0.1]; e-mail to Claudia Chan re bankruptcy court orders denying disqualification against David Criswell and denying motion for restraint and sanctions against trustee [0.1].	GLB	0.40	\$148.00	
02/20/20 Email from Claudia Chan re Szanto insistence on hearing in court and proposed letter to court [0.3]; revise letter to Singapore court with details of the UST's denial of discharge trial and e-mail to Claudia re same [1.2].	GLB	1.50	\$555.00	
02/24/20 Email from Claudia Chan re Szanto filings in Singapore and new deadlines [0.2].	GLB	0.20	\$74.00	
02/27/20 Review e-mails from David Criswell and Claudia Chan re Szanto and availability for assistance [0.1].	GLB	0.10	\$37.00	
03/06/20 Emails from and to Claudia Chan re extension of time to file response affidavit [0.1].	GLB	0.10	\$37.00	
03/09/20 Email from Claudia Chan re Szanto expert affidavit [0.1]; review CV Affidavit of Rosenberg filed by Szanto in Singapore, analyze issues re fraudulent affidavit, investigation of notary, death of Rosenberg [1.2]; e-mails from and to David Criswell re investigation of Leonard Rosenberg and notary [0.2]; review findings of Robyn Stein re notary and conference re same [0.4]; e-mails from and to Candace (several) re conversation with notary and affidavit re same and fraud on court [0.3]. Conference with Gary Blackridge regarding Rosenberg affidavit [0.3]; evaluate notary public identity using available online resources [0.7]; telephone call to Texas Secretary of State's office regarding notary registration [0.3]; telephone call and e-mail to Vivian Bailey, formerly Vivian Cooke, notary in Texas [0.2]; begin preparation of affidavits addressing Szantos' apparently falsified affidavit [1.1].	GLB RLS	2.20 2.60	\$814.00 \$845.00	
03/10/20 Telephone call and e-mail with notary Vivian Bailey regarding affidavit and finalize my affidavit regarding same.	RLS	0.60	\$195.00	
03/11/20 Email from Claudia Chan re response to Szanto fraudulent affidavit [0.1]; e-mail to Claudia re notary affidavits and need for sanctions against Szanto [0.1]; e-mail from Yam re seeking sanctions in Singapore against Szanto [0.1]; e-mail to Claudia re affidavits re notaries [0.2]; e-mails from and to David Criswell re copy of 9th Circuit prefiling order [0.1]. Final review of affidavits to insure completeness (including exhibits to same).	GLB RLS	0.60 0.30	\$222.00 \$97.50	

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
03/13/20	Email from Yam and review revisions to Criswell affidavit [0.2].	GLB	0.20	\$74.00
03/26/20	Email from Claudia Chan re revised affidavits for David Criswell and review same [0.2]; e-mail from Claudia Chan re draft fourth affidavit of Candace Amborn, review same and e-mail to Claudia Chan re comments on same [1.2].	GLB	1.40	\$518.00
03/27/20	Receive and review of Criswell's signed supplemental and responsive affidavits sent to Singapore counsel for filing [0.2].	GLB	0.20	\$74.00
03/31/20	E-mail correspondence to Claudia and Yam re opinion on denial of discharge for persuasive use in Singapore litigation [0.3].	GLB	0.30	\$111.00
04/01/20	Emails from and to Claudia re revised affidavit for Candace [0.1]; review and revise affidavit and e-mails to Candace re same [0.8]; e-mail correspondence to Claudia re revised affidavit and bankruptcy discharge and explanation of procedure for denial of discharge to explain revisions in affidavit [0.6].	GLB	1.50	\$555.00
04/02/20	Email from Claudia re final version of affidavit for Candace's signature and e-mail Candace re same [0.1].	GLB	0.10	\$37.00
04/07/20	Email correspondence to Candace re scope of OS-99 and difference in Judge McKittrick's view of entry of contempt order and necessity of getting all bankruptcy orders leading up to contempt order recognized in Singapore [0.3].	GLB	0.30	\$111.00
04/22/20	Email from Claudia Chan re Reply by Szanto [0.1]; review Szanto reply [0.8]; email to Claudia Chan re Szanto's reply and court's scheduling order [0.5].	GLB	1.40	\$518.00
04/23/20	Email from Claudia re clarification of the scheduling of the Singapore matter and providing a copy of HC/OS 99/2019 and review same [0.2]; e-mail to Claudia re HC/OS 99/2019 and Judge Abdullah's tactics with Szanto [0.2].	GLB	0.40	\$148.00
06/03/20	Email from Claudia Chan re court resetting hearing in July due to back up from pandemic [0.1]; e-mail to Claudia re concern over Szanto delaying due to changing travel plans to Singapore [0.2].	GLB	0.30	\$111.00
06/08/20	Email from Claudia Chan re Szanto request to set over July 20 hearing and push for Zoom video hearing [0.1]; e-mail to Claudia re approval for pushing for video hearing [0.1].	GLB	0.20	\$74.00
06/11/20	Email from Claudia Chan re proposed letter to court re Szanto request to postpone hearing and review same [0.1]; e-mail to Candace Amborn re proposed letter to Singapore court [0.1].	GLB	0.20	\$74.00
06/12/20	Email to Claudia Chan re approval of letter to court and question why court is scheduling a hearing on SUM 849 when the rule is inapplicable [0.3]; e-mails from and to Candace re approval of Singapore counsel's letter to court [0.1].	GLB	0.40	\$148.00
06/25/20	Email to Claudia Chan re status of setting the hearing for July 20 [0.1]; e-mail from Yam Wern-Jhein re hearing set for July 20 [0.1]; e-mail to and from Yam re Hogue's conversation with Szanto re Singapore suit and permission needed to serve out of country [0.1].	GLB	0.30	\$111.00
07/02/20	Email from Claudia Chan re hearing and Szanto's excuses and written submissions and request for information and approval of response filing [0.1]; review and analyze draft filing of skeletal submissions [0.8]; review other attachments to Claudia's e-mail re Szanto's correspondence with the Singapore Court re setting hearing [0.4]; review 9th Circuit dockets re pre-filing review order and Szanto's attempted appeal [0.2]; e-mail to Claudia Chan re status with the 9th Circuit and comments on skeletal submissions to Singapore Court [0.7].	GLB	2.20	\$814.00
07/07/20	Email from Claudia Chan re Applicant's Skeletal Submissions and review filing [0.2].	GLB	0.20	\$74.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
07/13/20 Emails from and to Claudia Chan re Szanto's motion to extend hearing and response to same and review motion to extend [0.3];	GLB	0.30	\$111.00
07/16/20 E-mails from and to Claudia Chan re court's decision to vacate hearing date [0.1];	GLB	0.10	\$37.00
07/30/20 Email to Claudia Chan re resetting Singapore hearing and misrepresentations by Szanto, copies of filings in Oregon courts when he is allegedly in Israel [0.3].	GLB	0.30	\$111.00
08/03/20 Email from Claudia Chan re hearing reset and Szanto filing to set over hearing and review and analyze both, including Szanto's allegations regarding the Israeli Defense Force [0.6]; lengthy e-mail correspondence to Claudia Chan re Szanto allegations in Singapore, conflicting filings in US courts, response to claims in Szanto filing, status in 9th Circuit [1.1]; e-mail to Jonas Anderson (UST) re contempt against Szanto, recent filing in Singapore, prior orders [0.7]; e-mail from Jonas [0.1].	GLB	2.50	\$925.00
08/04/20 Email from Claudia Chan re Court's letter to Szanto re conducting hearing via Zoom and proceeding with hearing on August 20 [0.1]; e-mail to Claudia re same and Szanto's duties at IDF allowing him to file motions and briefs [0.1].	GLB	0.20	\$74.00
08/18/20 Emails from Claudia Chan re Szanto's filings in Singapore re Writ of Summons against Arnot, Amborn and Hogue and court's reaction and review all attachments including correspondence between court and Szanto [1.1]; e-mail correspondence to Claudia Chan re discrepancies in allegations made by Szanto and motion for contempt [0.7].	GLB	1.80	\$666.00
08/19/20 Email from Claudia Chan re court filing by Szanto with exhibits and questions re exhibits [0.2]; review and analyze Szanto exhibits [0.4]; e-mail correspondence to Claudia re answers to questions regarding exhibits, status of purported appeal of conversion order to 9th Circuit and motion for contempt [0.7]; e-mail to Claudia re copy of motion for further contempt [0.1].	GLB	1.40	\$518.00
08/20/20 Email from Claudia Chan re summary of hearing and timing on judge's decision [0.2].	GLB	0.20	\$74.00
08/25/20 Email from Claudia Chan re Szanto's supplemental submissions to the court [0.1]; review Szanto's supplemental submissions to the Singapore court [0.9]; e-mail correspondence to Claudia Chan re Szanto supplemental submissions and points raised therein, letter to court, and discrepancies [0.9].	GLB	1.90	\$703.00
08/31/20 Receive and review e-mail from Claudia Chan re court's direction for further submissions to distinguish the Heince Tombak Singapore case [0.2]; review enclosures with Claudia's e-mail re reasons for further submissions [0.7]; e-mail to Claudia Chan re distinctions between involuntary Indonesian bankruptcy and voluntary US bankruptcy, further submissions to court and letter from Szanto to Mr. Yam [0.4].	GLB	1.30	\$481.00
09/08/20 Email from Claudia Chan re draft response to court on Szanto's emergency mercy petition to disburse funds [0.1]; review Szanto's filings with the court and proposed response [0.4]; e-mail to Claudia Chan re approval of response and Szanto's failure to ever provide any competent evidence and the misrepresentation of his allegations [0.2].	GLB	0.70	\$259.00
09/21/20 Email from Claudia Chan re briefing and submissions to Singapore Court, Szanto motion for stay and to disburse funds from court and rejection of his filings by court [0.7];	GLB	0.70	\$259.00
09/24/20 Email from Claudia Chan re request from Szanto for another extension to file reply brief [0.1]; e-mail to Claudia Chan re declining Szanto's request for an extension, Szanto's due process in the US, res judicata, distinction in the Heince case, and Szanto's inconsistent and irrelevant arguments [0.6];	GLB	0.70	\$259.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
09/25/20	Emails from and to Claudia re declining Szanto's request for an extension for filing reply brief [0.1];	GLB	0.10	\$37.00
10/06/20	Email from Yam Wern-Jhien re no replies filed, waiting for Judge Abdullah's ruling [0.1];	GLB	0.10	\$37.00
10/09/20	Emails from and to Claudia Chan re Singapore ruling [0.1]; e-mail to Candace re Singapore registrar's directions, applying for costs and contacting Michael Hogue re status and conversation with Boris Kukso re foreign bank account reporting [0.3]; telephone call from Candace Amborn re Registrar's Directions and obtaining order from Singapore court, applying for costs and administrative expenses, instructions to Claudia Chan [0.4];	GLB	0.80	\$296.00
10/12/20	Email correspondence to Claudia Chan re extracting the order from the Singapore court, applying for costs, notifying Michael Hogue of the Order and question about Singapore appeals [0.6];	GLB	0.60	\$222.00
10/13/20	Receive, review and analyze e-mail from Claudia Chan re explanation of "costs" in Singapore practice, contact with Michael Hogue and explanation of appeals in Singapore and stays of enforcement of same [0.2]; review and analyze attachments to Claudia's e-mail including e-mail correspondence between debtor and Singapore court, amended application substituting Candace Amborn in as applicant and Order of the Court [0.5];	GLB	0.70	\$259.00
10/14/20	Emails from and to Claudia Chan re costs [0.1]; e-mails from and to Claudia Chan re conversation with Michael Hogue [0.1];	GLB	0.20	\$74.00
10/19/20	Email from Claudia Chan re order from court imposing interim partial stay of order [0.1]; analyze interim stay [0.2]; e-mail correspondence to Claudia Chan re interim stay of order and enforcement of order, necessity of bond for stay on appeal [0.4].	GLB	0.70	\$259.00
10/21/20	Email correspondence to Michael Hogue re Singapore Court's interim stay of portions of order and District Court's stay of contempt motion [0.4].	GLB	0.40	\$148.00
10/22/20	Email from Claudia Chan re response to court re interim stay and analyze same [0.2].	GLB	0.20	\$74.00
10/26/20	Lengthy e-mail correspondence to Claudia Chan in response to her request re status of bankruptcy case and writing to court in objection to interim stay of Singapore order [1.6].	GLB	1.60	\$592.00
10/29/20	Email from Claudia Chan re draft correspondence to court re interim stay and review and analyze draft correspondence [0.2]; e-mail to Candace re draft correspondence to Singapore Court [0.1]; e-mail from Candace re draft correspondence [0.1]; e-mail correspondence to Claudia Chan re necessary revisions to draft correspondence to court in Singapore [0.8].	GLB	1.20	\$444.00
10/30/20	Email from Claudia Chan re final letter to court re interim stay and review same [0.1].	GLB	0.10	\$37.00
11/03/20	Email correspondence from Claudia Chan summarizing Szanto's letter to the court regarding his request to allow him to file a notice of appeal, his assertions that the case was wrongly decided, and his request for the court to release US\$60K from the account to him for the benefit of Mrs. Szanto and analyze same [0.5]; review Szanto's correspondence to the court and court's correspondence in reply [0.6]; e-mail correspondence to Claudia Chan re comments on Szanto's correspondence, Szanto's distortion of facts and misrepresentations [0.4].	GLB	1.50	\$555.00
11/11/20	Email from Claudia Chan re update from the court re interim stay [0.1]; review and analyze court's correspondence re appeal and termination of interim stay [0.3];	GLB	0.40	\$148.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
11/30/20	Receive and review e-mail from Claudia Chan and attached correspondence from court to Szanto re Szanto's letters to court requesting the court to waive the requirement for filing a Notice of Appeal and complaining that no Singapore attorney will represent him [0.2]; e-mail correspondence to Claudia re Szanto's application for proceeding in forma pauperis to prove indigency, likely reason for inability to get representation, inconsistent representations to courts and recommendations for proceeding [0.6].	GLB	0.80	\$296.00
12/14/20	Email to Claudia Chan re status of any appeal of the Singapore matter by Szanto and timing on court's order lifting the interim stay [0.2].	GLB	0.20	\$74.00
12/15/20	Email from Claudia Chan re Szanto's attempt at appealing the Singapore Court's decision, extending the interim stay of the order, threats of filing a writ of coram nobilis and review correspondence between Szanto and the Singapore court re same [0.4]; e-mail to Claudia Chan re same [0.1];	GLB	0.50	\$185.00
12/16/20	Email from Yam Wern-Jhien re interim stay lifted and application and order re same [0.1];	GLB	0.10	\$37.00

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blackridge, Gary L.	90.50	\$370.00	\$33,485.00
RLS	Stein, Robyn L.	3.50	\$325.00	\$1,137.50

**Sub-Total Fees:** \$34,622.50

<b>Costs and Expenses</b>	<b>Units</b>	<b>Rate</b>	<b>Amount</b>
03/31/20 Research Services			\$8.00
			<hr/>
<b>Sub-Total Costs and Expenses:</b>	<b>\$8.00</b>		
<b>Total Fees, Costs and Expenses:</b>	<b>\$34,630.50</b>		

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-77755 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Szanto Appeal of Conversion Order - 19cv00138

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
03/27/19	E-mails from and to former trustee re brief on appeal of Rule 60(b) [0.2].	GLB	0.20	\$74.00
05/06/19	E-mail from Steve Arnot re appeal of order on Rule 60(b) motion [0.1].	GLB	0.10	\$37.00
05/22/19	Review and analyze debtor's opening brief in his appeal of the conversion order [2.2].	GLB	2.20	\$814.00
05/28/19	Emails from and to Russ Garrett re strategy re response to debtor's opening brief and motion to dismiss appeal [0.2].	GLB	0.20	\$74.00
05/29/19	Confirm filing of opening brief on appeal by debtor of conversion order [0.1]; e-mail to Candace re copy of debtor's opening brief [0.1].	GLB	0.20	\$74.00
06/11/19	Commence work on response brief for appeal [0.5].	GLB	0.50	\$185.00
06/12/19	Review file and appeal documents including notice of appeal and initial review brief and supplemental record filed by pro se litigant.  Legal research regarding standard of review and case law related to BR 9024 and 60b for briefing.	RDG	0.90	\$333.00
	Telephone conference with trustee regarding transition and familiarity with details of file and need for extension for brief.	RDG	0.30	\$111.00
	Review local rule regarding motion for extension of time.	RDG	0.30	\$111.00
	Review rules and work on appellate brief for appeal on conversion order [0.9]; analyze rules on stays pending appeal, supersedeas bonds [0.4]; conference with Russ Garrett re appellate brief for district court Rule 60(b) motion [0.3].	GLB	1.60	\$592.00
	Strategize with Russ Garrett regarding procedure for district court appeal.	RLS	0.20	\$60.00
06/13/19	Review appeal status and begin preparation of notice of appearance and motion for extension of time to file response brief.	RLS	0.80	\$240.00
06/14/19	Contact UST regarding consent for motion for extension and follow up e-mail to Martin regarding same.  Review and revise draft motion, affidavit and order for extension.  Telephone conference with prior counsel regarding prior briefing.	RDG	0.30	\$111.00
		RDG	0.30	\$111.00
		RDG	0.20	\$74.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
06/14/19	Review issues raised by notice of appeal in light of prior designation of issues.	RDG	0.80	\$296.00
06/17/19	Continued legal research regarding appeal issues	RDG	2.30	\$851.00
	Emails from and to Norah Cartier re Arnot's draft of Rule 60(b) pleadings [0.2]; e-mail from Steve re draft brief [0.1]; receive order granting extension from Judge Simon [0.1].	GLB	0.40	\$148.00
	Follow up on motion for extension and notices of appearance [0.4]; telephone call to court regarding expedited hearing request [0.2]; begin preparation of remaining notices of appearance [0.2].	RLS	0.80	\$240.00
06/18/19	Continued legal research regarding appeal	RDG	3.30	\$1,221.00
	Confirm court grant of motion to extend time to file response brief and follow up on same.	RLS	0.20	\$60.00
	Continue preparation of remaining notices of appearance and notices of appointment of successor trustee.	RLS	0.30	\$90.00
06/19/19	Review motion for reconsideration filed by debtor in district court [0.1].	GLB	0.10	\$37.00
06/20/19	Receipt and review of IRS's response brief [0.6]; e-mail to Candace re IRS response brief [0.1].	GLB	0.70	\$259.00
06/21/19	Begin review of IRS response brief and record	RDG	2.50	\$925.00
	Start to review transcript	RDG	0.90	\$333.00
	Emails from and to Russ re Szanto history [0.2].	GLB	0.20	\$74.00
	Assess response brief filed by Department of Justice and strategize with Russ Garrett regarding format and content of our response brief [0.3]; assess court order on extension for Szanto to file new notices of appeal, provide direction to staff regarding follow up on same [0.2].	RLS	0.50	\$150.00
07/01/19	Complete legal analysis of debtor's appellate issues	RDG	3.20	\$1,184.00
07/02/19	Outline responsive brief	RDG	1.30	\$481.00
07/07/19	Review IRS brief and check cites and analysis with research and analysis completed	RDG	2.30	\$851.00
07/08/19	Outline issues to add to IRS brief tailored to trustee issues	RDG	0.80	\$296.00
07/09/19	Draft brief on behalf of trustee for filing	RDG	4.80	\$1,776.00
	Strategize with Russ Garrett regarding potential joinder in DOJ response brief on appeal.	RLS	0.20	\$60.00
07/10/19	review and revise brief	RDG	1.10	\$407.00
07/11/19	Review and revise Joinder in IRS response to Appellant's opening brief [0.7]; conference re revisions on Joinder [0.2];	GLB	0.90	\$333.00
07/17/19	Review Szanto's motion to stay filed in appeal and initial outline of objection and recommend delay to see if court rejects it as filed in the wrong court.	RDG	0.70	\$259.00
07/22/19	Review Szanto's motion for extensions and advise no action be taken as court grants these freely.	RDG	0.30	\$111.00
07/23/19	Receipt and review of Judge Simon's order extending Szanto's reply date [0.1];	GLB	0.10	\$37.00
07/24/19	Follow up for expected approval of motion for extension.	RDG	0.30	\$111.00
	Assess order from court on motion for extension of time to reply and consolidating dates for same, provide direction to staff regarding follow up on same.	RLS	0.20	\$60.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
08/13/19	Follow up regarding reply and review of extension issues.	RDG	0.30	\$111.00
08/20/19	Review and revise Objection to Motion to extend reply date and declaration in support of same [0.4]; Strategize regarding and prepare objection to extension request and declaration in support of same.	GLB	0.40	\$148.00
08/26/19	Receive order granting Szanto's motion for extension to file reply [0.1]. Assess court order granting second motion for extension of time for Szanto to file reply brief, provide direction to staff regarding follow up on same.	GLB	0.10	\$37.00
		RLS	0.20	\$60.00
09/12/19	Receipt correspondence from debtor/appellant re his disgust at our opposition to his motion for extension of time [0.1];	GLB	0.10	\$37.00
09/18/19	Review information regarding conferral from Szanto and respond to inquiry regarding Szanto's lack of response to me and address issues regarding appeal. Telephone call from Peter Szanto regarding extension for filing reply [0.2]; e-mail to Russ and Robyn re conferral with Szanto and need for opposition to motion for extension [0.1].	RDG	0.30	\$111.00
09/20/19	Receipt and review of Szanto's third motion for extension to file reply brief and analyze same [0.5]; conference with Robyn Stein re opposition to Szanto's third motion for extension [0.3]; e-mail to Candace re status of appeal of conversion order and Szanto's motion for extension [0.2]; receipt of Judge Simon's order granting third extension to file reply [0.1]; e-mail to Candace Amborn re same [0.1]. Assess most recent extension request filed by Szanto and provide direction to staff regarding follow up on same. [0.2]; assess court order on extension request and discuss seeking reconsideration of same [0.3].	GLB	1.20	\$444.00
09/27/19	Emails from and to Candace Amborn re status of appeal and due date for Szanto's reply [0.1].	GLB	0.10	\$37.00
10/09/19	Initial review of Szanto's reply brief. Assess reply brief to determine if any follow up needed and provide direction to staff regarding same.	RDG	0.30	\$111.00
10/10/19	Receipt and review of debtor's reply memorandum [0.9]; e-mail to Candace Amborn re debtor's reply brief [0.1].	RLS	0.20	\$60.00
01/23/20	Receive and review of Judge Simon opinion affirming bankruptcy Court order and judgment [0.3]; e-mail to Trustee re same [0.1].	GLB	1.00	\$370.00
02/10/20	Review notice of appeal and address briefing schedule.	RDG	0.40	\$74.00
02/16/20	Receipt and review of debtor's appeal of Judge Simon's ruling to 9th Circuit [0.1].	GLB	0.10	\$37.00
02/17/20	Review history from Gary and notice of appeal and motion to extend time and review status of Singapore matter and effect on it.	RDG	0.30	\$111.00
02/26/20	Assess notice of appearance filed in 9th Circuit appeal and review appeal docket to determine if any follow up needed regarding an appearance by Gary Blackridge.	RLS	0.20	\$65.00
03/06/20	Review status of 9th Circuit appeal and debtor's motion to extension [0.2]. Assess status of appeal and strategize with Gary Blackridge and Russ Garrett regarding same.	GLB	0.20	\$74.00
03/26/20	Evaluate status of appeal to determine if any follow up needed.	RLS	0.30	\$97.50
04/08/20	Evaluate status of 9th circuit appeal to determine if any follow up needed.	RLS	0.20	\$65.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
04/16/20	Email from Robyn re Szanto motion for extension of time with 9th Circuit and motion in 2017 case to lift the pre-filing order [0.1]; review motions filed by Szanto and e-mail Russ and Robyn re filing a motion to dismiss in the 9th circuit or waiting [0.4].  Assess motion for extension filed by Peter Szanto, memorandum to file regarding same, strategize regarding potential response to same.	GLB	0.50	\$185.00
10/21/20	Receipt and review of 9th Circuit Order Granting Motion for Extension of Time to file a statement of cause [0.1]; e-mail same to Candace [0.1].  Assess 9th Circuit order on Szanto request for extension to file statement in support of right to appeal, strategize regarding same.	GLB	0.20	\$74.00
11/13/20	Assess motion for extension to file statement of good cause for appeal, memorandum to file regarding same.	RLS	0.20	\$65.00
11/19/20	Receipt and review of order granting extension to file statement of good cause justifying appeal [0.1].  Assess court order on extension request, provide direction to staff regarding follow up on same.	GLB	0.10	\$37.00
12/21/20	Receive and review of debtor's Fourth Motion for Extension for filing Statement of Good Cause allowing appeal to proceed [0.3];	GLB	0.30	\$111.00

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blacklidge, Gary L.	12.40	\$370.00	\$4,588.00
RDG	Garrett, Russell D.	31.50	\$370.00	\$11,655.00
RLS	Stein, Robyn L.	5.40	\$300.00	\$1,620.00
RLS	Stein, Robyn L.	2.00	\$325.00	\$650.00

**Sub-Total Fees:****\$18,513.00**

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-78049 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Susan Szanto Claim Appeal: 19-cv-00213

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
01/24/20 Review status of appeal [0.1].	GLB	0.10	\$37.00
01/29/20 Review case register for appeal and discover stay lifted and court's request for briefing schedule [0.3]; analyze need to substitute appellee [0.2]; review opinion, notice of appeal and designation of record in preparation for considering briefing schedule [0.8].	GLB	1.30	\$481.00
01/30/20 Prepare Notice of Substitution of Appellee and provide direction to staff regarding filing and service of same.	RLS	1.80	\$585.00
02/04/20 Review notice of appeal and court's order re scheduling and e-mail Susan Szanto re proposed schedule for case and requirement to notify court with proposed scheduling order [0.5].	GLB	0.50	\$185.00
02/05/20 Email from Peter Szanto re response to case scheduling [0.1]; e-mail to Peter Szanto re dates for case schedule, communications in writing [0.4].	GLB	0.50	\$185.00
02/07/20 Review and analyze appeal issues, status and designation of record [0.7]; draft Appellee's separate proposed case schedule [0.4]; revise and finalize proposed case schedule [0.1]; receipt and review of Appellant's Notice/Response Regarding Time to complete opening brief [0.1].	GLB	1.30	\$481.00
02/11/20 Receipt and review of scheduling order [0.1].	GLB	0.10	\$37.00
02/19/20 Receive and review Szanto's motion for extension of time to file brief.	RDG	0.10	\$37.00
06/25/20 Receipt of order changing briefing schedule [0.1].	GLB	0.10	\$37.00
06/26/20 Telephone call from Steve Arnot re removing his name from appeal [0.1].	GLB	0.10	\$37.00
07/13/20 Receive and review Szanto motion for extension of time [0.2];	GLB	0.20	\$74.00
07/14/20 Receive and review or order granting extension in part for filing opening brief [0.1];	GLB	0.10	\$37.00
07/29/20 Receipt and review of Susan Szanto's second motion for extension drafted by debtor [0.2].	GLB	0.20	\$74.00
07/30/20 Receive and review of order granting second motion for extension to file opening brief [0.1].	GLB	0.10	\$37.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
08/13/20	Assess third request for extension to determine if any follow up needed.	RLS	0.20	\$65.00
08/17/20	Review correspondence from court regarding extension for Szanto and recommend next steps.	RDG	0.20	\$74.00
	Receipt and review of third motion for extension of time and analyze same [0.3]; receipt of order granting extension [0.1].	GLB	0.40	\$148.00
09/11/20	Receipt and review of Susan Szanto's opening appellate brief and appendix [1.9];	GLB	1.90	\$703.00
09/14/20	Conference with Robyn Stein re issues on appeal, preparing response [0.4]; telephone call with Robyn Stein re response brief issues and irrelevant matters raised by Szanto [0.6]; Strategize with Gary Blackridge regarding response brief [0.3]; review appellant's brief and file documents [0.8].	GLB	1.00	\$370.00
09/15/20	Telephone call from Robyn Stein and transcript of hearing and Szanto's failure to have transcript transcribed [0.3]; Continue review of file materials and follow up on transcript, compile record and begin preparation of response brief.	GLB	0.30	\$111.00
09/16/20	Continue preparation of response brief.	RLS	0.50	\$162.50
09/21/20	Continue preparation of response brief.	RLS	0.90	\$292.50
09/22/20	Review and address code and rules sections for Proof of Claim rules, standard of review and defenses and provide information to Robyn for brief. Review analysis of In re Laurel Canyon BAP case and abuse of discretionary case management matter [0.3]; e-mail to Robyn Stein re same [0.1]; Continue preparation of response brief.	GLB	0.40	\$148.00
09/23/20	Telephone call from Robyn Stein re response brief issues, hearing exhibits and record [0.3]; e-mails from and to Robyn re physical exhibits [0.1]; Continue preparation of appellee's brief.	RLS	4.60	\$1,495.00
09/24/20	Continue preparation of appellee's brief.	RLS	4.20	\$1,365.00
09/25/20	Continue preparation of appellee's brief and appendix to same.	RLS	5.70	\$1,852.50
09/27/20	Continue preparation of appellee's brief.	RLS	5.50	\$1,787.50
09/28/20	Continue preparation of appellee's brief.	RLS	1.80	\$585.00
09/29/20	Emails to and from Robyn Stein re exhibits from hearing [0.1]; telephone call from Robyn Stein re issues for response brief and status of same [0.3]; Continue preparation of appellee's brief.	GLB	0.40	\$148.00
09/30/20	Review and revise brief. Emails from and to Robyn Stein re confirming Susan Szanto's appearance at status conference by video conference [0.1]; review and revise draft of appellee's brief [2.2]; review and revise introduction, summary of argument and conclusion to brief and e-mail to Robyn re same [0.5]; Continue preparation of appellee's brief.	RLS	10.50	\$3,412.50
10/01/20	Review and revise brief.	RDG	0.60	\$222.00
	Emails from and to Robyn Stein re confirming Susan Szanto's appearance at status conference by video conference [0.1]; review and revise draft of appellee's brief [2.2]; review and revise introduction, summary of argument and conclusion to brief and e-mail to Robyn re same [0.5]; Continue preparation of appellee's brief.	GLB	2.80	\$1,036.00
	Review and revise brief.	RLS	10.20	\$3,315.00
	Review and revise brief.	RDG	0.60	\$222.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
10/01/20	Emails from and to Robyn Stein re revisions to brief [0.1]; review revised summary of argument and e-mail to Robyn re same [0.1]; review revised brief and approve same [0.4]; e-mail to Candace Amborn re Appellee's Brief [0.1]; Revise and finalize appellee's brief and appendix to same.	GLB	0.70	\$259.00
10/05/20	Receive and review of order re due date for Szanto reply brief [0.1]; Provide direction to staff regarding next steps in appeal, and e-mail with Heather Bingham regarding brief.	GLB	0.10	\$37.00
10/07/20	Receipt and review revised scheduling order [0.1];	GLB	0.10	\$37.00
12/10/20	Receive and review of motion to extend due date for reply brief [0.4]; receipt and review of first supplement to motion to extend due date [0.2]; receipt and review of Judge Simon's order granting extension [0.1].	GLB	0.70	\$259.00
12/11/20	Receive and review Susan Szanto's motion for extension and issues related to contempt motion. Assess motion for extension to file reply and order on same, provide direction to staff regarding follow up on same.	RDG	0.40	\$148.00
12/15/20	Review motion for another extension of time and order granting same attend district court.	RDG	0.20	\$74.00
12/24/20	Assess correspondence from Peter Szanto regarding death of spouse, and strategize with Gary Blackridge and Russ Garrett regarding potential impact on appeal.	RLS	0.20	\$65.00

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blackridge, Gary L.	13.80	\$370.00	\$5,106.00
RDG	Garrett, Russell D.	3.40	\$370.00	\$1,258.00
RLS	Stein, Robyn L.	60.90	\$325.00	\$19,792.50

**Sub-Total Fees:** \$26,156.50

<b>Costs and Expenses</b>	<b>Units</b>	<b>Rate</b>	<b>Amount</b>
12/31/20 Postage			\$14.10

**Sub-Total Costs and Expenses:** \$14.10

**Total Fees, Costs and Expenses:** \$26,170.60

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-78050 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Yankee Trust Corporation Appeal: 3:18-cv-01841

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
04/18/19 Review and revise and finalize notice of appearance and substitution of plaintiff in Yankee Trust adversary proceeding [0.4].	GLB	0.40	\$148.00
01/24/20 Review status of appeal [0.1].	GLB	0.10	\$37.00
01/29/20 Review case register and analyze need to get Candace and Jordan Ramis substituted in for briefing schedule [0.3].	GLB	0.30	\$111.00
01/30/20 Prepare Notice of Substitution of Plaintiff and provide direction to staff regarding filing and service of same.	RLS	1.80	\$585.00
02/04/20 Review notice of appeal and Judge Simon's order and e-mail Peter Szanto re case schedule [0.4].	GLB	0.40	\$148.00
02/07/20 Review and analyze appellate issues, status and designation of record [0.7]; draft Appellee's separate proposed case schedule [0.4]; revise and finalize proposed case schedule [0.1].	GLB	1.20	\$444.00
02/11/20 Receipt and review of scheduling order [0.1].	GLB	0.10	\$37.00
06/25/20 Receipt of order changing briefing schedule [0.1].	GLB	0.10	\$37.00
07/14/20 Receipt and review of Szanto second motion for extension to file opening brief [0.2]; receive and review of order granting extension in part to file opening brief [0.1];	GLB	0.30	\$111.00
08/18/20 Receipt and review of debtor's fourth motion for extension to file opening brief [0.2]; e-mail to Candace Amborn re same [0.1].	GLB	0.30	\$111.00
08/20/20 Receive and review of order granting fourth extension for filing opening brief [0.1].	GLB	0.10	\$37.00
09/15/20 Emails to and from Robyn Stein re Yankee Trust Corp transcript of record [0.2]; review docket and case history [0.2]; review transcript of hearing [0.4]; e-mails to and from Robyn re ordering transcript [0.1]; Evaluate status of appeal and strategize with Gary Blackridge regarding next steps, including transcript [0.3]; communicate with court reporter regarding transcript order [0.2].	GLB	0.90	\$333.00
09/21/20 Review transcript of pre-trial conference [0.3];	RLS	0.50	\$162.50
	GLB	0.30	\$111.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
09/21/20	Follow up with court reporter on transcript on appeal [0.1]; review transcript to confirm no redaction required in accordance with procedural rules, memorandum regarding same and provide direction to staff regarding follow up on same [0.4].	RLS	0.50	\$162.50
09/30/20	Review debtor's motion for continuance and confirm no conferral with staff or lawyers and outline objection.  Telephone conference with debtor Mr. Szanto regarding his experience with our office and who he is leaving voice mails with and confer and recommend motion for status conference in the event he is unable to file his brief by the continued date of October 14 in order to get all parties on the same page regarding a new briefing schedule.  Prepare rough draft motion for status conference.	RDG	0.90	\$333.00
		RDG	0.40	\$148.00
		RDG	0.50	\$185.00
	Telephone conferences with all three lawyers and reception staff regarding any messages left by Szanto in the last 9 months on the general voice mail box attend 8 am or otherwise and confirm no contract, no voice mails and no notices of same.	RDG	0.90	\$333.00
	Receipt and review of debtor's fifth motion for extension of time to file opening brief [0.3]; telephone call from Russ Garrett re responding to motion for extension [0.3]; receive order granting extension [0.1]; conference with Russ re stopping work on response [0.1];	GLB	0.80	\$296.00
10/07/20	Receipt and review of revised scheduling order [0.1];	GLB	0.10	\$37.00
10/16/20	Begin review of appellant's opening brief in advance of preparation of response to same.	RLS	0.60	\$195.00
10/19/20	Continue preparation of record in advance of drafting response brief.	RLS	1.00	\$325.00
10/20/20	Review and analyze Szanto's opening brief [1.9].  Strategize with Gary Blackridge regarding issues on appeal and continue preparation of record in advance of drafting response brief.	GLB	1.90	\$703.00
10/21/20	Continue preparation of response brief.	RLS	5.30	\$1,722.50
10/22/20	Analyze issues on appeal and confer with Robyn Stein re same and issues to be addressed in brief [0.5].  Continue preparation of appellee's brief, including compiling additional portions of the appendix and crafting statement of the case.	GLB	0.50	\$185.00
10/23/20	Continue preparation of appellee's brief, including remainder of statement of the case, and beginning of argument portion of brief on standing and scope of appeal.	RLS	4.90	\$1,592.50
10/26/20	Continue preparation of argument, jurisdiction and standard of review portions of appellee's brief.	RLS	5.50	\$1,787.50
10/27/20	Continue preparation of appellee's brief argument sections.	RLS	8.00	\$2,600.00
10/28/20	Emails from and to Robyn re status of response brief [0.1].  Continue preparation of argument sections of appellee's brief, as well as standard of review and jurisdictional issues.	GLB	6.70	\$37.00
10/29/20	Review Trustee's response brief and several e-mails to Robyn Stein re same [2.3].  Revise and fine tune appellee's brief, review appendix and add all record citations, check all caselaw citations for law changes.	RLS	7.50	\$2,437.50
10/30/20	Telephone call from Robyn re finalizing brief and thoughts on arguments [0.2].  Finalize appellee's brief and provide direction to staff regarding filing of same.	GLB	2.30	\$851.00
		RLS	0.20	\$74.00
		RLS	4.50	\$3,055.00
		RLS	4.50	\$1,462.50

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
11/23/20	Receive and review of Szanto's motion for extension of time to file reply brief [0.3]; receipt and review of order denying motion for extension but may reconsider if reply is filed by December 7 [0.1].	GLB	0.40	\$148.00
	Assess Szanto request for extension of time to file reply currently due on November 25th, memorandum to file regarding same.	RLS	0.20	\$65.00
12/11/20	Receive and review of Szanto's motion for relief from lateness for reply brief [0.2]; review Szanto's reply brief and supplement [1.0].	GLB	1.20	\$444.00
	Review reply brief and motion for extension regarding same to determine if any follow up needed.	RLS	0.80	\$260.00
12/16/20	Receipt of Order granting Szanto extension for filing reply [0.1]; Strategize with Gary Blackridge and Russ Garrett regarding Szanto's reply brief following Szanto's varied representations in telephone call with Mr. Blackridge.	GLB	0.10	\$37.00
12/22/20	Assess court notification regarding transcript on appeal to determine if any follow up needed.	RLS	0.10	\$32.50

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blackridge, Gary L.	12.10	\$370.00	\$4,477.00
RDG	Garrett, Russell D.	2.70	\$370.00	\$999.00
RLS	Stein, Robyn L.	60.40	\$325.00	\$19,630.00

**Sub-Total Fees:** **\$25,106.00**

<b>Costs and Expenses</b>	<b>Units</b>	<b>Rate</b>	<b>Amount</b>
09/19/20 Court Reporter Fee			\$72.25

**Sub-Total Costs and Expenses:** **\$72.25**

**Total Fees, Costs and Expenses:** **\$25,178.25**

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-78051 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Appeal of Williams Kastner Compensation Order 19-1039

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
06/04/19 Receive Notice of Appeal of Compensation order [0.2].	GLB	0.20	\$74.00
06/18/19 Receive and review Order striking amended notices of appeal [0.1]	GLB	0.10	\$37.00
07/01/19 Receive Szanto notices of appeal of compensation orders [0.2].	GLB	0.20	\$74.00
07/02/19 Receive and review debtor's amended notice of appeal re appealing compensation orders [0.2]; e-mail to Candace re compensation orders and debtor's appeals of same [0.2].	GLB	0.40	\$148.00
07/08/19 Receive e-mail from Steve Arnot re case on appealability of interim fee app orders and review case of Rosenfeld v US [0.4]; e-mail to Candace re same [0.1]; e-mail from Steve Arnot re case re interim compensation of trustee and review Stewart case [0.3]; e-mail to Steve re concerns and confusion over filing for WKG&M [0.1]; analyze issues regarding appeals of compensation orders and appealability of interim orders [0.6]; emails to and from Ward Greene re appeal of Williams Kastner attorney fees and motion to dismiss [0.3].	GLB	1.80	\$666.00
07/10/19 Telephone call from Ward Greene at Williams Kastner re appeal of compensation orders and representation and defense of appeals [0.4].	GLB	0.40	\$148.00
07/15/19 Receipt and review of debtor's designation of record on appeal of compensation orders [0.2]; e-mail to Candace re Williams Kastner and opposing appeal of compensation orders and whether Williams Kastner may represent itself in the appeal [0.4]; review PACER re Szanto appeals of compensation orders and Judge Simon's order allowing more time and analyze untimely appeals [0.3].	GLB	0.90	\$333.00
07/17/19 E-mails from and to Ward Greene re responding to appeal and employment for standing [0.2]. Email from Ward Greene re appeal [0.1]; e-mail to Ward Greene re WKG&M defending appeal of order for compensation [0.2].	GLB	0.20	\$74.00
10/10/19 Review filings in district court re debtor's appeal of interim compensation orders, analyze timeliness, and review docket for statement of issues on appeal, review scheduling order and timing on debtor's opening brief [1.3]; e-mail to Ward Greene and Steve Arnot re re status of appeal, timing and dismissal [0.3].	GLB	0.30	\$111.00
	GLB	1.60	\$592.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
10/13/19 Emails from and to Ward Greene re motion to dismiss appeal of compensation orders [0.2].	GLB	0.20	\$74.00
10/14/19 Email from Ward Greene re phone conference with Steve Arnot [0.1]; e-mail to Candace Amborn re discussion with Ward Greene re motion to dismiss appeal of compensation orders [0.2]; e-mail to Ward Greene re phone conference and appeal of compensation orders [0.1]; telephone call from Candace re appeal of compensation orders [0.2]; receive voice mail message from and leave voice mail message for Ward Greene [0.1]; review and analyze federal rules re dismissal of appeals [0.6]; review both bankruptcy court docket and district court docket re filings and statement of record on appeal [0.8]; e-mail from Ward Greene re telephone discussion with Steve Arnot re motion to dismiss [0.1]; e-mail to Ward re same, transmittal of record and designation of record and deadline file brief [0.3]; review draft motion to dismiss drafted by Steve Arnot and e-mail same to Ward Greene [0.4].	GLB	2.90	\$1,073.00
10/15/19 Email to Ward Greene and Steve Arnot re joint motion to dismiss appeal of compensation orders [0.1]; e-mails from Ward and Steve re same [0.1]; e-mail to Candace re approval of proceeding with joint motion to dismiss appeal [0.1].	GLB	0.30	\$111.00
10/23/19 Email from Steve Arnot re draft motion to dismiss appeal of compensation orders [0.1]; review and edit draft motion and e-mails to and from Steve re same [0.4].	GLB	0.50	\$185.00
10/25/19 Revise motion to dismiss appeal to include bases for violation of rules and scheduling order and further edits [1.0]; e-mail to Steve Arnot and Ward Greene re same [0.1]; e-mail from Steve Arnot re representation for motion to dismiss [0.1]; e-mail to Steve re concern about conflicts in representation of former trustee in motion to dismiss [0.3].	GLB	1.50	\$555.00
10/29/19 Edit motion to dismiss appeal [0.1]; e-mail to Ward Greene and Steve Arnot re filing motion to dismiss [0.1]; e-mails from and to Shellece re filing motion and certification [0.1]; e-mail from Steve Arnot re conferring on motion [0.1].	GLB	0.40	\$148.00
10/30/19 Email from Ward Greene re conferring with Szanto re dismissal of appeal [0.1].	GLB	0.10	\$37.00
10/31/19 Receive e-mail from Ward Greene to Debtor re conferring on motion to dismiss appeal [0.1].	GLB	0.10	\$37.00
11/04/19 Receipt of filed Motion to Dismiss and e-mail to Candace re same [0.1].	GLB	0.10	\$37.00
11/07/19 Receive and review court's order allowing Szanto until November 22 to file his response and December 9 to file our reply [0.1].	GLB	0.10	\$37.00
11/25/19 Receipt of Judge Simon's order granting extension for Szanto to file his reply [0.1].	GLB	0.10	\$37.00
12/05/19 Receive and review of Debtor's Second Motion for Extension of Time to File a response to Motion to Dismiss [0.2]; receive order granting debtor's extension of time to respond to motion [0.1].	GLB	0.30	\$111.00
12/19/19 Receipt and review of debtor's response to motion to dismiss appeal [1.1]; e-mail to Ward Greene and Steve Arnot re stay of appeals, Statement of Issues on Appeal and debtor's arguments [0.7].	GLB	1.80	\$666.00
12/31/19 Email to Ward Greene and Steve Arnot re filing reply and recent order in 18cv0939 that 19cv01089 not stayed [0.2]; e-mails from and to Steve Arnot re Reply to debtor's response [0.2].	GLB	0.40	\$148.00
01/02/20 Email from Steve Arnot re reply to debtor's response to motion to dismiss [0.1]; review and edit reply and e-mail to Steve re same [0.9].	GLB	1.00	\$370.00
01/03/20 Emails from and to Ward Greene re Szanto e-mail and threats [0.2]; receipt and review Szanto motion for Sur-Reply [0.2]; e-mail to Candace re status of appeal of compensation orders [0.1]; receive court's order granting leave to file sur-reply [0.1].	GLB	0.60	\$222.00

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
01/06/20	Receipt and review of debtor's Sur-reply [0.4]; e-mail to Ward and Steve re same [0.1]; e-mails from and to Ward Greene re sur-reply and recent filings that may be useful if oral argument is scheduled [0.2].	GLB	0.70	\$259.00
01/08/20	Receipt of Order allowing debtor extension of time for filing his opening brief [0.1]; e-mails from and to Ward Greene re same [0.1].	GLB	0.20	\$74.00
01/23/20	Receive and review of Judge Simon's ruling on appeal of compensation orders and judgment thereon [0.2]; email to Candace Amborn re same [0.1].	GLB	0.30	\$111.00

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blackridge, Gary L.	17.70	\$370.00	\$6,549.00

**Sub-Total Fees:** **\$6,549.00**

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-78100 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Amborn v. HSBC – Adv Proc. #18-03029

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
04/16/19	Telephone call from Stephanie at Judge McKittrick's chambers re status conference [0.1]; attend telephone status conference with Judge McKittrick re status of Singapore action for lodging of contempt order and setting new status conference date [0.2]; telephone call from Michael Hogue HSBC US attorney re status [0.1]; telephone call from Michael Hogue HSBC Bank re adversary proceeding and status of Singapore matter and appeals [0.3]; conference with paralegal re substitution of plaintiff and counsel in HSBC adversary proceeding [0.2].	GLB	0.90	\$333.00
04/17/19	Review Pacer on Arnot v HSBC Bank re status [0.1].	GLB	0.10	\$37.00
04/18/19	Review and revise and finalize notice of appearance and substitution of plaintiff in HSBC Bank adversary proceeding [0.4].	GLB	0.40	\$148.00
04/19/19	Email from and telephone call to PJ Knight at bankruptcy court re substitutions in adversary proceedings [0.2].	GLB	0.20	\$74.00
06/11/19	Telephone status conference in Amborn v HSBC Bank re abatement to September 10 [0.2].	GLB	0.20	\$74.00
09/06/19	Voice mail message from and telephone call to Michael Hogue re status in Singapore re status conference [0.2].	GLB	0.20	\$74.00
09/09/19	Prepare for status conference on Adversary proceeding against HSBC Bank [0.2].	GLB	0.20	\$74.00
09/10/19	Correspondence to Judge McKittrick re status of adversary proceeding [0.4]; receipt of minutes of status conference [0.1].	GLB	0.50	\$185.00
12/09/19	Telephone call from Michael Hogue re status conference [0.1].	GLB	0.10	\$37.00
12/10/19	Attend telephone status conference and obtain set over [0.3].	GLB	0.30	\$111.00
01/06/20	Email from Michael Hogue re consent for Bank to contact Singapore counsel [0.1]; e-mail to Candace re e-mail from Hogue [0.1]; e-mail to Michael Hogue re recent filings by Szanto, allegations of post-petition earnings and contacting Singapore counsel [0.2].	GLB	0.40	\$148.00
01/30/20	Emails from and to Michael Hogue re status of Singapore matter in preparation for status conference [0.4].	GLB	0.40	\$148.00
02/10/20	Review status of matters for reporting to court for status conference [0.2].	GLB	0.20	\$74.00

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
02/11/20 Attend telephonic status conference [0.2]; telephone call from attorney Michael Hogue re status in Singapore and concern about Szanto threats to have HSBC personnel subpoenaed for hearing [0.3].	GLB	0.50	\$185.00
06/25/20 Voicemail from and telephone call to Michael Hogue re status conference and Szanto calls to his firm [0.3]; voice mail message from Michael Hogue re conversation with Szanto re suit against Michael personally in Singapore filed by Szanto [0.1]; e-mail to Michael Hogue re Singapore counsel's comment on service out of country [0.1].	GLB	0.50	\$185.00
06/29/20 Prepare for status conference [0.3]; attend telephonic status conference [0.3].	GLB	0.60	\$222.00
07/21/20 Receipt and review of record of proceeding [0.1].	GLB	0.10	\$37.00
08/03/20 Email to Michael Hogue re status of matters in Singapore and Szanto alleged claim against Michael Hogue personally [0.2].	GLB	0.20	\$74.00
08/18/20 Email to Michael Hogue re status of matters in Singapore and motion for contempt [0.1].	GLB	0.10	\$37.00
08/20/20 Email to Michael Hogue re results of Singapore hearing [0.2].  Email from Michael Hogue re strategy for status conference depending on timing on Singapore ruling [0.1].	GLB	0.20 0.10	\$74.00 \$37.00
08/31/20 Email to Michael Hogue re delay in Singapore decision and status conference [0.2]; e-mail from Michael Hogue re same [0.1]; e-mail to Candace re status report and agreement with Hogue and e-mail from Candace re same [0.1].	GLB	0.40	\$148.00
09/08/20 Prepare for status conference [0.2]; attend status conference [0.2].	GLB	0.40	\$148.00
10/09/20 Email to Michael Hogue re Registrar's Directions from Singapore Court re judge's ruling and preparation of order [0.2];	GLB	0.20	\$74.00
10/13/20 Email correspondence to Michael Hogue re Order of the Singapore Court, request for copies of books and records of accounts, Szanto allegations, stipulation to dismiss adversary proceeding [0.6];	GLB	0.60	\$222.00
10/14/20 Email to Michael Hogue re response to e-mail re Singapore order and Szanto attempts to appeal Singapore decision [0.2]; e-mails from and to Michael Hogue reconfirmation of receipt of e-mail [0.1]; telephone call from Michael Hogue re providing records from bank and further transfers from account before it was frozen [0.2];	GLB	0.50	\$185.00
11/09/20 Emails from and to Michael Hogue re status of Singapore interim stay [0.1].	GLB	0.10	\$37.00
11/10/20 Review Singapore correspondence and pleadings in preparation for status conference [0.5]; attend telephonic status conference re dismissal or abatement [0.4]; receipt of record of proceeding [0.1];	GLB	1.00	\$370.00
11/11/20 Analyze issues re statute of limitations and dismissal v abatement [0.3]; e-mail correspondence to Michael Hogue re Singapore update on interim stay, timing on notice of appeal, costs bond that must be posted, Szanto's indigency and application for in forma pauperis and appointment of counsel, statute of limitations for Section 542 matters, split in circuits, recommendation for abating case [1.1]	GLB	1.40	\$518.00
11/12/20 Emails from and to Michael Hogue re status with Bank and in Singapore re stay of order and enforceability if appeal is filed [0.2];	GLB	0.20	\$74.00
12/16/20 Email correspondence to Michael Hogue re Singapore Court's lifting of interim stay of execution, providing account history, providing authorization forms and status of contempt hearing [0.3];	GLB	0.30	\$111.00

## Timekeeper Recap

T.K.	Name	Hours	Rate	Amount
GLB	Blackledge, Gary L.	11.50	\$370.00	\$4,255.00
<b>Sub-Total Fees:</b>				<b>\$4,255.00</b>

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-78583 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Appeal of Order 998 re denial of request for return of assets

<b>Professional Services Provided</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
07/07/20 Receipt and review of notice of appeal of Order 998 re demand to turn over assets to debtor and analyze action to be taken [0.3].	GLB	0.30	\$111.00
07/20/20 Receipt of first amended designation of record re appeal of order no. 998 [0.1].	GLB	0.10	\$37.00
08/24/20 Email from Lynn at Amborn's office re BAP order to pay filing fee to avoid dismissal [0.1]; review order and e-mail to Lynn re same [0.1].	GLB	0.20	\$74.00
09/15/20 Telephone conference with Robyn Stein re BAP appeals [0.2]; e-mail from Robyn re Order of conditional dismissal and review same [0.1]; Evaluate status of appeal and strategize with Gary Blackridge regarding next steps.	GLB	0.30	\$111.00
09/21/20 Confirm status of BAP appeals to determine next steps.	RLS	0.80	\$260.00
09/22/20 Email from Robyn Stein re making appearance and Szanto's motion for extension of time and waiver of filing fee [0.1]; review and analyze Szanto's motion for assistance of counsel and waiver of filing fee [0.5]; e-mail to Robyn re monitoring BAP appeal of denial of discharge for response from UST to same arguments Szanto is making in motion for extension and waiver of filing fee [0.1]; Assess status of BAP appeal in light of conditional dismissal order, memorandum to file regarding same.	GLB	0.70	\$259.00
09/29/20 Receive and analyze e-mail from Szanto re demand for return of assets alleging bankruptcy court is not a court of the US [0.2]; receipt and review of Notice filed by debtor re BAP referral IFP and analyze same and exhibits to same [0.4]; review Title 28 and e-mail correspondence responding to debtor re allegations that bankruptcy courts are not US courts and request to agree to stipulate that all orders of the bankruptcy court are void [0.8];	RLS	0.20	\$65.00
10/09/20 Prepare notices of appearance and provide direction to staff regarding filing of same.	GLB	1.40	\$518.00
10/12/20 Provide direction to staff regarding follow up on notices of appearance.	RLS	0.60	\$195.00
10/16/20 Provide direction to staff regarding follow up on notices of appearance.	RLS	0.20	\$65.00
10/16/20 Assess order from District Court on motion to proceed in forma pauperis and denying Szanto's request for appointment of counsel, memorandum to file regarding same, including expect next steps.	RLS	0.30	\$97.50

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
10/19/20	Assess court order re-setting briefing schedule, memorandum to file regarding same, and provide direction to staff regarding follow up on same.	RLS	0.30	\$97.50
12/02/20	Emails from and to Robyn re due date of response to opening brief and BAP never ruling on Szanto's motion to extend the filing date for the opening brief [0.2].  Receipt and review of District Court order re proceeding in forma pauperis [0.1].  Assess status of appeal and strategize with Russ Garrett and Gary Blacklidge regarding next steps and ways to prompt movement by the court on Szanto's long pending extension request.	GLB	0.20	\$74.00
12/03/20	Assess District Court order on prior IFP and motion to appoint counsel, memorandum to file regarding same.	RLS	0.20	\$65.00
12/04/20	Review correspondence from court regarding reset of timing.	RDG	0.30	\$111.00
12/08/20	Receive and review of order re extension of time to file opening brief [0.1].  Assess court scheduling order, memorandum to file regarding same, and provide direction to staff regarding appropriate follow up.	GLB	0.10	\$37.00
12/17/20	Receipt and review of debtor's third motion for extension for filing opening brief and analyze same [0.4];  Assess Szanto motion for extension and provide direction to staff regarding follow up on same [0.2]; strategize with Gary Blacklidge regarding objection and timing of appeal [0.2]; assess court order on same to determine if any follow up needed [0.1].	GLB	0.40	\$148.00
		RLS	0.50	\$162.50

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blacklidge, Gary L.	3.80	\$370.00	\$1,406.00
RDG	Garrett, Russell D.	0.30	\$370.00	\$111.00
RLS	Stein, Robyn L.	3.80	\$325.00	\$1,235.00

**Sub-Total Fees:** **\$2,752.00**

Candace E. Amborn  
PO Box 580  
Medford OR 97501

February 10, 2021

Client ID 54568-78756 GLB

Statement for period through December 31, 2020

**Legal Services Regarding:** Appeal of Order 982 re denial of objection to status report

<b>Professional Services Provided</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
06/15/20	Receipt of Notice of Appeal of Order 982 [0.1].	GLB	0.10	\$37.00
06/17/20	Review notice of appeal regarding trustee's status report and appeal from Rule 60b motion denial and initial analysis of need to respond.	RDG	0.40	\$148.00
	Email Russ Garrett re appeal of Rule 60(b) order on motion re status report [0.2]; e-mail to Candace re same [0.1].	GLB	0.30	\$111.00
06/23/20	Emails from and to Candace re Notice from BAP re appeal and strategy re frivolous appeal [0.1].	GLB	0.10	\$37.00
06/24/20	Email to Russ Garrett re frivolous appeals to BAP and strategy re same [0.3].	GLB	0.30	\$111.00
07/06/20	Conference with Russ Garrett re status of appeals and appeal of status report order [0.3].	GLB	0.30	\$111.00
12/02/20	Assess status of appeal and strategize with Russ Garrett and Gary Blackridge regarding next steps and ways to prompt movement by the court on Szanto's long pending extension request.	RLS	0.20	\$65.00
12/08/20	Receive and review order granting extension to file opening brief [0.1].	GLB	0.10	\$37.00
	Assess court scheduling order, memorandum to file regarding same, and provide direction to staff regarding appropriate follow up.	RLS	0.20	\$65.00

**Timekeeper Recap**

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
GLB	Blackridge, Gary L.	1.20	\$370.00	\$444.00
RDG	Garrett, Russell D.	0.40	\$370.00	\$148.00
RLS	Stein, Robyn L.	0.40	\$325.00	\$130.00

**Sub-Total Fees:** **\$722.00**